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April 12, 2011

**VIA EMAIL AND
OVERNIGHT MAIL**

Ms. Jessica O'Neill
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region III
Office of Regional Counsel (3RC30)
1650 Arch Street
Philadelphia, PA 19103

Mr. Martin Matlin
U.S. Environmental Protection Agency, Region III
Office of Land Enforcement (3LC70)
1650 Arch Street
Philadelphia, PA 19103

Re: Commonwealth Laminating & Coating, Inc.

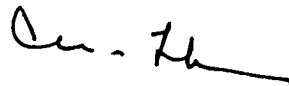
Dear Ms. O'Neill and Mr. Matlin:

We are counsel for Commonwealth Laminating & Coating, Inc., and have been handed your March 22, 2011, letter, which was received on March 25, 2011. Accordingly, within 20 days of the receipt of this letter, we hereby request a settlement meeting or conference as outlined in your letter. You may contact me with a proposed time and place for this meeting or conference.

In the meantime, if you have any preliminary calculations regarding proposed penalties, we would appreciate the opportunity to review those prior to the meeting or conference.

Very truly yours,

GENTRY LOCKE RAKES & MOORE, LLP



Charles L. Williams

CLW:lbs

cc: Mr. M. Brandon Lane
Paul G. Klockenbrink, Esq.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

MAR 22 2011

Matt Phillips
Vice President of Operations
Commonwealth Laminating & Coating, Inc.
345 Beaver Creek Drive
Martinsville, VA 24112

Re: Request for Further Information and Opportunity to Show Cause

Dear Mr. Phillips,

This letter is a follow-up to a compliance evaluation inspection ("the Inspection") conducted on November 17, 2010 at the Commonwealth Laminating and Coating, Inc. facility ("CLC" or "the Facility") located at 345 Beaver Creek Drive, in Martinsville, VA, by duly authorized representatives ("Inspectors") of the U.S. Environmental Protection Agency ("EPA" or "the Agency"). The purpose of that Inspection was to determine compliance with the Resource Conservation and Recovery Act ("RCRA"), as amended, 42 U.S.C. §§ 6901, *et seq.*, the federal hazardous waste regulations set forth at 40 C.F.R. Parts 260-266, 268 and 270-273, and the authorized State of Virginia Hazardous Waste Management Program.

The Commonwealth of Virginia has received federal authorization to administer a Hazardous Waste Management Program (the "Virginia Hazardous Waste Management Program") in lieu of the federal hazardous waste management program established under RCRA Subtitle C, 42 U.S.C. §§ 6921-6939e. The Virginia Hazardous Waste Management Regulations ("VaHWMR"), as codified at VaHWMR §§ 1.0 *et seq.* (1984), were authorized, effective December 18, 1984 (49 Fed. Reg. 47391 (December 4, 1984)), by EPA pursuant to Section 3006(b) of RCRA, 42 U.S.C. § 6926(b), and 40 C.F.R. Part 271, Subpart A, and subsequently were re-authorized effective: August 13, 1993 (58 Fed. Reg. 32,885 (June 14, 1993)); September 29, 2000 (65 Fed. Reg. 46,607 (July 31, 2000)); June 20, 2003 (68 Fed. Reg. 36,925 (June 20, 2003)); July 10, 2006 (71 Fed. Reg. 27,216 (May 10, 2006)); and July 30, 2008 (73 Fed. Reg. 44,168 (July 30, 2008)). The current VaHWMR incorporate, with certain exceptions, definitions and adopt specific provisions of Title 40 of the 2006 Code of Federal Regulations by reference. See 9 VAC 20-60-14, -18 and -260 through -279.

Section 3008(a) of RCRA authorizes EPA to take enforcement action whenever it is determined that a person is in violation of any requirement of EPA's regulations implementing RCRA Subtitle C, or any regulation of a state hazardous waste program which has been authorized by EPA. Section 3008(g) of RCRA, 42 U.S.C. § 6928(g), authorizes the assessment of a civil penalty against any person who violates any requirement of Subtitle C of RCRA. The provisions of the VaHWMR have become requirements of RCRA Subtitle C and are enforceable by EPA.



Based upon the information currently available to the Agency, EPA believes that there is a sufficient basis for the issuance of an Administrative Complaint against CLC seeking the assessment of a civil penalty and containing a Compliance Order requiring the Facility to comply with RCRA and the authorized provisions of the VaHWMR. Prior to issuing an Administrative Complaint, EPA is providing representatives of CLC with the opportunity to meet and/or confer with EPA representatives, provide additional relevant information and "show cause" as to any reasons why EPA should not file an Administrative Complaint for the violations preliminarily identified and described below. EPA is also inviting CLC to discuss with EPA the possibility of entering into a settlement of the violations without litigation.

I. VIOLATIONS AND SUPPORTING FACTS

1. Operation Without a Permit or Interim Status

Prior to and at the time of the Inspection, the Facility was a large quantity generator of hazardous waste. 9 VAC 20-60-270, with exceptions not relevant to this matter, incorporates by reference the federal regulations in 40 C.F.R. Part 270, including 40 C.F.R. § 270.1, which provides that no person may own or operate a facility for the treatment, storage or disposal of hazardous waste without first obtaining a permit or interim status for such facility. CLC may have attempted to comply with the temporary (less than 90-day) accumulation exemption to the permit requirement, found in 9 VAC 20-60-262, which incorporates by reference 40 C.F.R. Part 262, including 40 C.F.R. § 262.34(a). However, the Facility did not qualify for this exemption because of its failure to comply with all of the conditions for this exemption, as noted by EPA's inspectors on the day of the inspection. Those conditions are listed in 40 C.F.R. § 262.34(a), incorporated by reference by 9 VAC 20-60-262, and include the requirements that:

1. While being accumulated at or near the point of generation where wastes initially accumulate, each container is labeled or marked clearly with the words "Hazardous Waste" or with other words that identify the contents of the container, 40 C.F.R. § 262.34(c)(1)(ii);
2. A generator complies with the requirements of 40 C.F.R. Part 265, including the requirement at 40 C.F.R. § 265.173(a) that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste
3. The generator accumulates only as much as 55 gallon of hazardous waste in a satellite accumulation area, 40 C.F.R. § 262.34(c);
4. Facility personnel successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste management regulations and take part in an annual review of the required initial training, 40 C.F.R. § 265.16(c);
5. The owner or operator of the facility keeps records at the facility documenting the job title for each position at the facility relating to hazardous waste management and the name of the employee filling each job; a written job description for each position listed, including the duties of facility personnel assigned to each position; and the training required and completed by the personnel filling the positions, 40 C.F.R. § 265.16(d); and
6. The owner or operator of the facility maintains an updated contingency plan, including a list of all emergency equipment at the facility, 40 C.F.R. § 265.52.



CLC failed to qualify for this exemption. Specifically, as observed during EPA's inspection on November 17, 2010, CLC:

1. Failed to label or mark each container storing hazardous waste in a satellite accumulation area with the words "Hazardous Waste" or other words identifying the contents of the containers. The Inspectors observed containers in the Laboratory, the U73 Pressure-Sensitive Coating Room, and the Polyester Dyeing Line either unlabeled or labeled only as "waste."
2. Failed to keep containers holding hazardous waste closed during storage, except when necessary to add or remove waste. The Inspectors observed several containers throughout the facility that contained hazardous waste but were not properly closed.
3. Accumulated greater than 55 gallons of hazardous waste in a satellite accumulation area. In the satellite accumulation areas associated with the U72 Pressure-Sensitive Coating Line, the U73 Pressure-Sensitive Coating Line, and in the Polyester Dyeing line, the Inspectors observed more than 55 gallons of hazardous waste being accumulated.
4. Failed to conduct annual refresher training for employees. During their review of the Facility's training database, the Inspectors observed that there was no documentation of consistent annual refresher training for several employees whose jobs would require hazardous waste training.
5. Failed to maintain a documentation of the job titles and job description for each position at the facility related to hazardous waste management. During their review of the Facility's training database, the Inspectors observed that it did not contain the job titles or written job descriptions of employees whose positions related to hazardous waste management.
6. Failed to maintain an updated contingency plan. In their review of the Facility's contingency plan, the Inspectors observed that it did not contain a list of the emergency equipment at the facility.

By virtue of these actions or failures to act, CLC failed to satisfy the exemption conditions set forth in 9 VAC 20-60-262, incorporating 40 C.F.R. § 262.34(a).

2. Failure to Keep Containers Closed

During the period of time during which CLC stored hazardous waste at the facility while failing to qualify for the temporary accumulation exception of 40 C.F.R. § 262.34(a), as incorporated by reference in 9 VAC 20-60-262, CLC was the owner/operator of a hazardous waste storage facility without a RCRA permit, in violation of 9 VAC 20-60-270, which incorporates by reference 40 C.F.R. § 270.1. As a result, CLC was required to comply with the provisions of 9 VAC 20-60-264, which incorporates by reference 40 C.F.R. Part 264. CLC was required to comply with the provisions of 40 C.F.R. Part 264, including 40 C.F.R. § 264.173(a), which requires that containers holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. During the November 17, 2010 Inspection, the Inspectors observed several containers throughout the facility that contained hazardous waste but were not properly closed. The Facility's failure to keep these containers closed when it was not necessary to add or remove waste was a violation of 9 VAC 20-60-264.



3. Failure to Make a Waste Determination

9 VAC 20-60-262 incorporates by reference 40 C.F.R. part 262, including 40 C.F.R. § 262.11, which requires that a person who generates a solid waste determine if that waste is a hazardous waste. CLC, as a generator of solid wastes, was required to determine if those solid wastes were hazardous wastes. During the November 17, 2010 Inspection, the Inspectors observed aerosol cans disposed of in the general trash, and Facility representatives indicated that this was CLC's typical practice for aerosol cans. The Inspectors also observed contaminated wipes disposed of in the general trash. Waste determinations should have been conducted for these types of solid wastes to ensure proper disposal. CLC's failure to determine whether the cans and wipes were hazardous wastes was a violation of 9 VAC 20-60-262.

4. Failure to Keep Universal Wastes in Closed Containers

9 VAC 20-60-273 incorporates by reference 40 C.F.R. Part 273, which provides standards for universal waste management. EPA has determined that CLC is a small quantity handler of universal waste. CLC was therefore required to comply with 40 C.F.R. § 273.13(d)(1), which requires that a small quantity handler of universal waste contain any lamp in containers or packages that must remain closed and lack evidence of leakage, spillage, or damage that could cause leakage under reasonably foreseeable conditions. During the November 17, 2010 Inspection, the Inspectors observed six open boxes containing universal waste lamps, as well as several loose universal waste lamps, in the Boiler Room. CLC's failure to keep these universal waste lamps in properly closed containers was a violation of 9 VAC 20-60-273.

5. Failure to Label Universal Waste Containers

As a small quantity handler of universal waste, CLC was also required to comply with 40 C.F.R. § 273.14(e), incorporated by reference by 9 VAC 20-60-273, which requires that each lamp or a container or package in which lamps are contained must be labeled or marked clearly with one of the following phrases: "universal waste—lamps," or "waste lamps," or "used lamps." During the November 17, 2010 Inspection, the Inspectors observed that none of the boxes of lamps or loose lamps in the Boiler Room were properly labeled or marked. CLC's failure to properly label or mark these universal waste lamps and universal waste lamp containers was a violation of 9 VAC 20-60-273.

6. Failure to Conduct Annual Hazardous Waste Training

9 VAC 20-60-264 incorporates 40 C.F.R. Part 264, including 40 C.F.R. § 264.16(a), which requires that facility personnel must successfully complete a program of classroom instruction or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with hazardous waste management regulations. Moreover, personnel must take part in an annual review of the required initial training. 40 C.F.R. § 264.16(c). During the November 17, 2010 Inspection, the Inspectors reviewed CLC's training database. The Inspectors observed that there was no documentation of consistent annual refresher training for several employees whose job responsibilities would require that they receive hazardous waste training in order to perform their duties in a way that ensures the Facility's compliance with hazardous waste management requirements. Specifically, the Inspectors noted that Charles Clark, Barry Hylton, John Braziel, and Ernie Showfety all would require hazardous waste



training and an annual review of the initial training. The Facility's failure to provide facility personnel with annual hazardous waste training for 2006, 2007, 2008, 2009, and 2010 was in violation of 9 VAC 20-60-264.

7. Failure to Maintain Job Description Records

9 VAC 20-60-264 incorporates 40 C.F.R. Part 264, including 40 C.F.R. § 264.16(d), which requires that the owner or operator of the facility keep records at the facility documenting the job title for each position at the facility relating to hazardous waste management and the name of the employee filling each job; a written job description for each position listed, including the duties of facility personnel assigned to each position; and the training required and completed by the personnel filling the positions. During the Inspectors' review of CLC's training database, they observed that it did not contain the job titles or written job descriptions of employees whose positions related to hazardous waste management. CLC's failure to maintain records containing this information was a violation of 9 VAC 20-60-264.

8. Failure to Maintain an Updated Contingency Plan

9 VAC 20-60-264 incorporates 40 C.F.R. Part 264, including 40 C.F.R. § 264.52, which requires that the owner or operator of the facility maintains an updated contingency plan, including a list of all emergency equipment at the facility. During the November 17, 2010 Inspection, the Inspectors noted that the Facility's contingency plan did not contain a list of the emergency equipment at the facility. CLC's failure to include this information was a violation of 9 VAC 20-60-264.

II. REQUEST TO SHOW CAUSE & NOTICE OF OPPORTUNITY TO CONFER AND PROVIDE ADDITIONAL INFORMATION

Pursuant to Sections 3008(a)(1) and (g) of RCRA, 42 U.S.C. §§ 6928(a)(1) and (g), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance and Corrective Action Orders, and the Revocation, Termination or Suspension of Permits* (the "Consolidated Rules of Practice," included as Enclosure 1), 40 C.F.R. Part 22, EPA is authorized to commence a civil administrative action for the assessment of civil penalties for violations of the above-cited regulations.

The Consolidated Rules of Practice also allow EPA and an alleged violator to execute a settlement agreement resolving EPA's claims for violations such as those identified above. Under this authority, EPA simultaneously may commence and conclude a case without the filing or issuance of an Administrative Complaint. See 40 C.F.R. § 22.13(b). **In such instances, the proposed penalty also may be reduced to reflect the lower transaction costs incurred by EPA in resolving such matters through the pre-filing settlement process rather than through litigation.**

Please note that in instances where an expeditious pre-filing settlement is not achieved, EPA typically files an Administrative Complaint and thereby initiates a civil administrative proceeding. If an Administrative Complaint is filed against it, CLC will have the right to request a hearing on the issues raised and on the penalty proposed in the Administrative Complaint, as explained in § 22.15 of EPA's Consolidated Rules of Practice.



However, EPA initially seeks to provide CLC with an informal opportunity to respond to EPA's preliminary conclusions. EPA further encourages the submission of any additional information that CLC believes the Agency should consider in its further review and investigation of this matter.¹

Please send any and all supplemental information that you wish EPA representatives to review and consider in this matter to the attention of either:

Martin Matlin
U.S. Environmental Protection Agency, Region III
Office of Land Enforcement (3LC70)
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029;

or

Jessica O'Neill
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region III
Office of Regional Counsel (3RC30)
1650 Arch Street
Philadelphia, Pennsylvania 19103.

If CLC representatives wish to meet and/or confer with EPA representatives in person or via teleconference, **such a settlement meeting or conference must be requested within twenty (20) days of your receipt of this letter.** At such meeting or conference, CLC representatives may take the opportunity to "show cause" why EPA's present information concerning the above-identified violations of the VaHWMR and the federal hazardous waste regulations is not correct and/or to articulate the reasons, if any, why they believe that EPA should not commence an

¹ CLC is entitled to assert a business confidentiality claim covering any part of the submitted information, pursuant to the regulations set forth at 40 C.F.R. Part 2, Subpart B, subject to EPA's evaluation of the information's confidential status. Unless such a confidentiality claim is asserted at the time the required information is submitted, EPA may make this information available to the public without further notice to CLC. Information subject to a business confidentiality claim may be made available to the public only to the extent set forth in the above-cited regulations. Any such claim for confidentiality must conform to the requirements set forth in 40 C.F.R. § 2.203(b). CLC must also include as part of any submission of information or documentation to EPA pursuant to this Request to Show Cause the following signed and dated certification:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this response to Information Request and all attached documents, and that, based on my inquiry of those individuals immediately responsible for obtaining or compiling the information, I believe that the submitted information is true, accurate, and complete. I recognize that there are significant penalties for submitting false and/or misleading information, including the possibility of fine and/or imprisonment."

Signature: _____
Printed Name: _____
Title: _____



administrative civil enforcement action against CLC. During such requested meeting or conference, EPA representatives will also be willing to discuss the potential pre-litigation administrative settlement and resolution of CLC's civil liability for the identified violations — including appropriate civil penalties and any necessary compliance activities. Please note, however, that any resulting settlement must conform with applicable EPA Enforcement Response Policies and with EPA's Consolidated Rules of Practice, and must include CLC's agreement to pay an appropriate civil monetary penalty through its execution of a written Administrative Consent Agreement, the requirements of which are set forth at 40 C.F.R. § 22.18(b).

Based upon the information currently in its possession, EPA will calculate and present to CLC during an initial settlement meeting or conference, a penalty settlement proposal for the full and complete settlement and resolution of CLC's civil liability for the violations herein enumerated. EPA's proposed penalty settlement amount will be calculated in accordance with EPA's October, 1990 RCRA Civil Penalty Policy, as revised in June, 2003 ("RCRA Penalty Policy", Enclosure 2), which reflects the statutory penalty criteria and factors set forth at Sections 3008(a)(3) and (g) of RCRA, 42 U.S.C. §§ 6982(a)(3) and (g) and the applicable provisions of the Civil Monetary Penalty Inflation Adjustment Rule, 40 C.F.R. Part 19. In determining the amount of any penalty to propose in an enforcement action, RCRA Sections 3008(a)(3) and (g), 42 U.S.C. §§ 6928(a)(3) and (g), require EPA to take into consideration the seriousness of the violation(s) and any good faith effort(s) by the Respondent to comply with the applicable requirements. Pursuant to the RCRA Civil Penalty Policy, EPA may consider the degree of a violator's willfulness or negligence and its ability to pay a proposed penalty. Initially, EPA may presume that a business has the ability to pay a proposed civil penalty and to continue in business based on the size of the business and the perceived economic impact of the proposed penalty on that business. A Respondent may submit appropriate documentation to rebut any such presumption(s). EPA will consider, among other factors, a Respondent's ability to pay as a basis for adjusting a proposed civil penalty. The burden of raising and demonstrating any claimed inability to pay all, or any portion of, a proposed civil penalty rests with the Respondent.

Please be advised that certain companies may be required to disclose to the Securities and Exchange Commission the existence of certain pending or known to be contemplated environmental legal proceedings (administrative or judicial) arising under Federal, State or local environmental laws. Please see the attached "Notice of Securities and Exchange Commission Registrants' Duty to Disclose Environmental Legal Proceedings" (Enclosure 3) for more information about this SEC requirement. Additionally, EPA has not determined whether your company may be a "small business" under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). The attached "EPA Small Business Resources Information Sheet" (Enclosure 4) provides information on contacting the SBREFA Ombudsman to comment on federal enforcement and compliance activities and also provides information on compliance assistance. A decision to participate in such program or to seek compliance assistance does not relieve the obligation to respond in a timely manner to an EPA request or other enforcement action, does not create any new rights or defenses under law, and will not affect EPA's decision to pursue this enforcement action. To preserve your legal rights, a facility must comply with all rules governing the administrative enforcement process. The Ombudsman and fairness boards do not participate in the resolution of EPA's enforcement action.



To request and schedule a settlement conference, or with any questions concerning this matter, please contact Mr. Matlin at (215) 814-5789 or have your attorney contact Ms. O'Neill at (215) 814-2655. *A request for a settlement conference must be made within twenty (20) days of receipt of this letter.*

Sincerely,



Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

Enclosures

cc: Martin Matlin
Office of Land Enforcement (3LC70)

Jessica O'Neill
Assistant Regional Counsel (3RC30)





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1350 Arch Street
Philadelphia, Pennsylvania 19103-2029

Mr. Justin Williams
Waste Enforcement Manager
Virginia Department Environmental Quality
P.O. Box 1105
Richmond, VA 23218-1105

JAN 11 2011

**RE: RCRA Proposed Complaint, Compliance Order and Notice of Opportunity for Hearing
Commonwealth Laminating & Coating, Inc. (VAR000008433)**

Dear Mr. Williams:

The U.S. Environmental Protection Agency Region III is pursuing the issuance of a Proposed Complaint, Compliance Order and Notice of Opportunity for Hearing to Commonwealth Laminating & Coating, Inc. in Martinsville, VA (VAR000008433) pursuant to the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments (HSWA) of 1984. These actions will address violations of RCRA Subtitle C.

I appreciate your cooperation in this matter and look forward to your continued efforts toward a successful enforcement program. Should you have any questions regarding this matter, please contact me at (215) 814-5430 or Martin Matlin at (215) 814-5789.

Sincerely,

A handwritten signature in cursive script, appearing to read "Carol Amend".

Carol Amend, Associate Director
Land and Chemicals Division
Office of Land Enforcement

cc: M. Matlin, 3LC70 ✓

RCRA Compliance Evaluation Inspection

Commonwealth Laminating & Coating, Inc.

345 Beaver Creek Drive
Martinsville, VA 24112

RCRA Identification No. VAR000008433

Large Quantity Generator
SIC Code: 3081

Date of Inspection: November 17, 2010

EPA Representatives:

Martin Matlin, Environmental Scientist
Office of Land Enforcement
(215) 814-5789

Ken Cox, Environmental Engineer
Office of Land Enforcement
(215) 814-3441

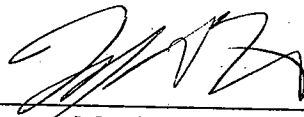
VADEQ Representative:

Rebecca Wright, Environmental Specialist II
Blue Ridge Regional Office
(540) 562-6811

Facility Representatives:

M. Brandon Lane, Product Development Engineer
(276) 632-4911 x244

John Braziel, Plant Engineer
(276) 632-4991 x231



Martin Matlin
December, 2010

Table of Contents

<u>Section</u>	<u>Page</u>
1.0 Introduction	3
2.0 Facility Background Information	3
2.1 Description of Facility	3
2.2 Permit Status	3
2.3 Process Description	3
3.0 Hazardous and Non-Hazardous Waste Generation	4
4.0 Hazardous Waste Storage	4
5.0 Inspection Observations	5
5.1 RCRA Accumulation Area #1	5
5.2 RCRA Accumulation Area #2	5
5.3 Caustic Cleaner Room ("Old Mix Room")	5
5.4 Main Mix Area & RCRA Accumulation Area #3	6
5.5 U72 Coating Line	6
5.6 Laboratory	6
5.7 U73 Coating Line	7
5.8 Polyester Dyeing Line	7
5.9 Tank Farm	7
5.10 U60 Line	8
5.11 Caustic Stripping Area	8
5.12 Boiler Room	8
6.0 Records Review	9
6.1 Manifests and LDR Forms	9
6.2 Inspection Records	9
6.3 Contingency Plan	9
6.4 Biennial Reports	9
6.5 Training	9
6.6 Waste Analyses/Profiles	10
6.7 NMP Storage	10
6.8 Vapor Recovery Solvents	10
7.0 Attachments	11

1.0 Introduction

On November 17, 2010, the United States Environmental Protection Agency, Region III (EPA), Land and Chemicals Division, Office of Land Enforcement conducted an unannounced Compliance Evaluation Inspection (CEI) under the Resource Conservation and Recovery Act (RCRA), as amended, 42 U.S.C. Sections 6901 et seq. of Commonwealth Laminating & Coating, Inc. ("CLC" or "the facility"). EPA representatives Martin Matlin and Ken Cox were accompanied by Virginia Department of Environmental Quality (VADEQ) representative Rebecca Wright.

The inspectors entered the facility at 9:35 a.m. and presented credentials to M. Brandon Lane, Product Development Engineer. The inspectors were then led to a conference room where the purpose of the inspection was explained. Near the end of the initial interview John Braziel, Plant Engineer, joined the group.

The inspection included an evaluation of the facility's processes and its compliance with RCRA and the federally authorized Virginia Hazardous Waste Management Regulations. All information included in this report is the result of statements by the facility representative, materials shown to the inspectors by the facility representative and/or documents provided by the facility representative to the inspectors at the time of the inspection. In addition, information gathered prior to the inspection from a review of EPA and State records may be included in this report.

2.0 Facility Background Information

2.1 Description of Facility

The facility has been present at this site for the last ten to twelve years, with the site previously being occupied by a textile finishing company. In April 2006 an 80% stake of CLC was purchased by the private equity firm Riverside, and in August 2010 the facility was purchased from Riverside by Transportation Resource Partners, associated with Penske Automotive Group and Fenway Partners. The facility occupies about 10 acres and employs around 110 personnel, running two twelve-hour shifts for production and operating 24 hours, seven days a week. CLC laminates and dyes polyester films for window tinting and security needs for residential, commercial and automotive markets.

2.2 Permit Status

CLC is currently reporting as a RCRA Large Quantity Generator and does not have a RCRA permit.

2.3 Process Description

Polyester film is brought into the facility in rolls, some of which may be pre-coated or metalized. The rolls are then coated through one or more of three main lines: scratch-resistant hard coat, laminating adhesive, and pressure-sensitive adhesive. Both the laminating adhesive

and hard coat chemicals must be diluted with solvent onsite, prior to use. Solvents used include MEK and toluene primarily, along with various acetates. After coating, the rolls are directed through a drying chamber, then may be shipped whole or slit to specifications and packaged individually prior to shipment.

The facility also conducts a polyester dyeing operation which uses ethylene glycol and n-methyl-pyrrolidone (NMP) along with multiple dyes and pigments. After dyeing, these rolls may also be slit to size before being packaged for distribution.

3.0 Hazardous and Non-Hazardous Waste Generation

The following waste streams are classified as hazardous or non-hazardous according to the facility's generator knowledge:

- **Leftover coating solids:** Hazardous waste (HW) generated from the coating machines -- includes adhesive and coating solids mixed with solvents; stored onsite in drums
- **Recovered solvents:** the facility has a vapor recovery unit which generates solvent liquids that are stored onsite in drums and either sent to Blue Ridge Solvents & Coatings for direct reuse (as non-HW) or if contaminated, sent offsite as HW
- **Rag waste:** generated from machine wipe-downs and compressed onsite into a 55gal drum; sent offsite as HW to an incinerator
- **Caustic cleaner:** used to clean machine parts, this is a mixture of caustic, isopropyl alcohol and water; stored onsite as HW in drums
- **Ethylene glycol and dye waste:** considered non-HW, with the glycol reused after reclamation
- **NMP waste:** generated from the dyeing process and pumped to an onsite tank, sent offsite for reclamation as a non-HW
- **Universal Waste:** spent lamps and batteries are stored in boxes as Universal Waste (UW)
- **Used oil:** generated from gear boxes and general maintenance, considered non-HW
- **E-Waste:** if not reused, sent offsite along with UW
- **Aerosol cans:** the representative was unsure of how these items were managed onsite

4.0 Hazardous Waste Storage

The facility maintains three less-than-90-day storage areas: a drum storage area at the north end of the Warehouse ("RCRA Accumulation Area #1"), the rag compactor near the Mix Room ("RCRA Accumulation Area #2"), and in the Mix Room ("RCRA Accumulation Area

#3"). There is one satellite storage area at each of the four lines (three coating and one dyeing): U72, U73, B1 and U60, as well as in the caustic cleaning area of the Old Mix Room.

5.0 Inspection Observations

A tour of the facility began at 10:15 a.m. and resulted in the following observations:

5.1 RCRA Accumulation Area #1

Several 55gal drums were found in this area (see Attachment #1, Photographic Log, Photograph 3), including:

- four 55gal drums against one wall, all labeled as containing non-HW, with one additionally labeled on the lid as containing "N-Methyl Pyrrolidone" and "Flammable Liquid," dated 2/1/10 (Photo 2). According to Mr. Lane, these drums contained soapy sludge generated by Univar after cleaning the tanker truck CLC sent with spent NMP to be reclaimed. He stated that these drums had not yet been sampled.
- five 55gal drums labeled as containing HW, all but one dated from November, with one drum of caustic stripper dated 9/28/10
- three 55gal drums labeled non-HW ethylene glycol
- several partially filled drums of acetic acid raw material

While leaving this room, the inspectors encountered employee Barry Hylton transporting by forklift a pallet of four 55gal drums filled with HW from various satellite areas to this accumulation area.

5.2 RCRA Accumulation Area #2

One 55gal drum was found in this area with a compression device installed on its top (Photo 4). It was labeled as HW and dated 11/9/10.

5.3 Caustic Cleaner Room ("Old Mix Room")

One 55gal drum was found here, labeled as HW "Caustic Stripper" and closed (Photo 5). The representative stated that this waste stream consists of 90% water and 7% isopropyl alcohol (IPA) mixed with caustic powder. It is used to clean the coating cylinders and pumped to this drum when the solution becomes too dirty.

One 25gal container was also found here, labeled "Rag Waste" and "Caustic Stripper" (Photo 6). The container was about half full of dirty rags and did not fully close (Photos 7 & 8). The representative stated that this container is emptied into the rag compressor drum at Accumulation Area #2 every 12 hours.

A parts washing sink was also found here, closed and with a small closed bucket nearby labeled "MEK." According to the representative this bucket is used to collect drippage when the sink is cleaned out.

5.4 Main Mix Area & RCRA Accumulation Area #3

In the Main Mix Area three vessels were present for mixing the three types of coatings/adhesives. These materials are then pumped through a filter and into drums for use throughout the facility.

RCRA Accumulation Area #3 is located within the mix area, and at the time of inspection one 55gal drum was found labeled as HW and dated. Nearby a 5gal pail was found slightly open due to the pail's ground wire pulling up on the lid. This container collects drips from hose transfers and, according to the representative, gets dumped into the 55gal drum next to it after "almost" every use. There appeared to be a few inches of sludge buildup inside the pail. The inspectors were asked not to take photographs in this room due to flammability concerns.

On a counter in this room several in-use aerosol cans were found, including four cans labeled "ZEP Power House" and "Heavy Duty," one can labeled as "High Performance" Rustoleum enamel primer and one can labeled "Aero Mop Treatment." Upon questioning, Mr. Hylton stated that spent cans are typically disposed of in the trash.

5.5 U72 Coating Line

Individual coating machines are located within smaller enclosed rooms inside the main room for each line. See Photo 9 for an example of such a room for the Pressure-Sensitive Adhesive line within the U72 Room. The machines unwind the polyester roll, clean it, and apply the various coatings alternating with drying sequences. In each of these smaller machine rooms there is typically a HW storage area with one 55gal drum to store "refusal" (a mixture of solvent and solids that falls out of the process during application), and a smaller container holding HW rags and debris from cleanups.

In the machine room for Pressure-Sensitive Adhesive on the U72 line, one 55gal drum was found labeled as "Heavy Waste Drum" which had an open bung and a tube leading into it (Photo 11). A small pump on the floor connected the coating machine to this drum by a clear plastic tube (Photo 10). According to Mr. Lane this drum is emptied a couple of times per day. Also found in this glassed-in area was a 25gal closed container labeled "Rag Waste."

In the machine room for the U72 Scratch Resistant Coating line a closed 55gal drum was found, labeled as "U72 Heavy Waste Drum" (Photo 12). According to the representative the waste generated in this machine must be placed into the drum by hand.

5.6 Laboratory

A small workstation was observed in the Lab where small rods used in the coating process are cleaned with MEK (Photo 13). Next to the counter a 5gal unlabeled container was

found with several used wipes inside (Photo 14). Mr. Lane stated that this container's contents were typically not managed as HW.

Next to another workstation in this area an unlabeled 10gal container was found, slightly open and filled with rags, gloves and other debris (Photos 15 & 16). According to Mr. Lane this material would typically go to the rag compressor in Accumulation Area #2.

5.7 U73 Coating Line

This line is set up similarly to the previously described line, with several enclosed areas for each machine within the main room. In the area for the Scratch-Resistant Coater machine one 55gal drum was found closed, labeled "U73 Heavy Waste Drum" and undated. Next to it an empty 10gal container was found, labeled only as "Waste."

In the area for the Pressure-Sensitive Coater, a similar 55gal drum was found, along with a 10gal container also labeled only as "Waste." The 10gal container was not fully closed and had some paper waste trailing from it (Photo 17). Mr. Braziel stated that the smaller containers are typically emptied once per shift.

5.8 Polyester Dyeing Line

This is a newer line which utilizes a superheated ethylene glycol bath combined with various dyes, and an NMP wash followed by a water wash. The glycol bath is hooked into a vapor recovery system, with the recovered glycol reused in the same operation. Spent NMP (typically 80-90% concentration after use) is pumped to a 15,000gal aboveground tank just outside the plant building, prior to shipment offsite for reclamation.

At the time of the inspection one 55gal drum labeled "Heavy Waste Drum" was found next to the dye line, along with a 21gal unlabeled, partially open container about one-quarter full of rags (Photos 18 & 19).

Photograph 20 shows the pump and some of the piping used to convey the waste NMP to the outdoor tank. None of the equipment appeared to be labeled.

5.9 Tank Farm

Four 15,000gal aboveground tanks are situated just outside the building near the dye line. Three of the tanks contain raw materials and one of them contains the waste NMP described above (Photo 21). The only label found on the tank was a health and safety sticker showing the following classifications: Health = 1, Flammability = 1, Reactivity = 0 and Personal Protection = Gloves. According to the representative, each of the tanks is double-walled with interstitial sensors, and there are no valves located on the bottom of the tanks. Although there are concrete side walls on the perimeter of ground below the tanks, the floor of this area consists only of pea gravel over soil.

After viewing the tanks, the inspectors were shown the computer console which controls

and monitors the tanks. It showed that the NMP tank contained 32.2" of material, equating to 2,660gal according to a nearby table.

5.10 U60 Line

This line is used for laminating two rolls of polyester together using adhesive. One 55gal drum was found next to the machine, labeled as "Heavy Waste Drum." It had an open bung and a tube leading into a funnel on the drum. Mr. Lane stated that the process was currently changing raw materials, so the drum was being loaded during the inspection.

One 21gal container was also found here, closed and labeled as "Rag Waste" and about one-third full of material. Another 21gal container was found on the other side of the laminator, also labeled "Rag Waste" and about 20 feet from the other two containers, slightly open and about one-third full.

Next to a side wall of this room, an open and unlabeled cardboard container was found (Photo 22). It contained various trash and used wipes and smelled of alcohol (most likely IPA). The representative stated that its contents were typically considered non-HW and disposed of as trash. A parts washer labeled as containing MEK was also found in this room.

5.11 Caustic Stripping Area

One 55gal drum was found here, labeled as containing "Caustic Stripper (U60)" waste from the nearby caustic cleaning unit.

Also found were two 55gal drums described as containing solvent recovered from the facility's vapor recovery unit on the other side of the wall. One of these drums had open bung holes with a level detector placed in one of the holes and a tube from the wall running into the other (Photo 23). Both were labeled only with an original toluene product sticker on the side of the drum. Just outside the building on the other side of this wall the facility's vapor recovery unit was observed. A small pump at the bottom connected to the tube running through the wall to the drum (Photo 24). None of the equipment appeared to be labeled.

The representative stated that solvent recovered from this unit typically goes to Blue Ridge Solvents for reuse. However, if the recovered liquid appears cloudy, the facility would conduct a gas chromatography test and may send it off as HW if it is too contaminated with materials other than toluene and MEK.

5.12 Boiler Room

Several loose spent fluorescent lamps were found here, along with six open boxes of spent lamps (Photo 25). None of the boxes appeared to be labeled, except for two boxes marked with the date 7/22/10.

6.0 Records Review

6.1 Manifests and LDR Forms

Manifests and Land Disposal Restriction (LDR) forms for 2009 through 2010 were reviewed, with the following observations:

- Manifest #007514219 for a shipment received on 11/3/10 by Giant Resource Recovery in Sumter, SC was not dated by the generator (Attachment 2)
- One shipment of spent fluorescent bulbs was found on 6/3/10, going to VLS Recovery Services in Mauldin, SC

For the time period reviewed, manifests were signed primarily by Barry Hylton and Charles Clark.

6.2 Inspection Records

Weekly inspection logs for the last three years were reviewed and no concerns were noted. Inspections of the following areas were typically included: "U60 Machine," "Vapor Recovery Section," "Compactor," "Old Mix Room," "90 Days Accumulation Area," "Dumpster," "U72 Machine/SR Coater," "U72 Machine/PS Coater," "Universal Waste," "New Mix Room," and U73 Machine "SR" and "PS" Coaters. A sample log is included as Attachment 3.

6.3 Contingency Plan

The facility's most recent Contingency Plan was reviewed and only one concern was noted: although the facility included a site drawing showing their spill kit location, no list of spill equipment was found. In the plan Mr. Braziel was listed as the primary Emergency Coordinator, with Mr. Lane and Ernie Showfety listed as alternates.

6.4 Biennial Reports

Biennial Reports for the years 2007 and 2009 were reviewed. For 2009 the facility reported as a Large Quantity Generator. In the 2007 report, however, the facility incorrectly reported on page 2 that it was not a generator of HW (see Attachment 4).

6.5 Training

Although the facility maintains a list of job titles with corresponding training requirements, no job descriptions were found, nor any clear list matching employees names to specific job titles.

Additionally, whereas CLC tracks employee training using a computerized database, it appeared that several employees whose jobs would require HW training did not show records of

consistent yearly training. For example, both Charles Clark and Barry Hylton have responsibilities ranging from signing manifests to HW transport from satellite to less-than-90-day areas. In the training database printout provided, Mr. Clark had no record of HW training, had "Hazardous Communications" training in 2006 and 2009 only, Contingency Plan training in 2009 only, and had "DOT - Hazardous Materials" training in 2010 only. Mr. Hylton had HW training in 2004, 2005, then not until 2008-2010; "Hazardous Communications" training only in 2004-2006; and "DOT - Hazardous Materials" training in 2004 and 2007. Mr. Braziel, Plant Engineer and primary Emergency Coordinator, had HW training for the last five years except for 2006. Mr. Showfety, listed as an Emergency Coordinator in the Contingency Plan, received "Fire Extinguisher" and "Emergency Actions Plan" training in 2006 alone, and had no HW training recorded. Please see Attachment 5 for the facility's list of job titles and a printout from the training database.

6.6 Waste Analyses/Profiles

Several waste determinations were found in the facility's records, including the following: October 2009 profile of the aqueous caustic waste (as D002), February 2009 profiles of the ethylene glycol and dye wastes (determined non-HW), February 2008 profile of the facility's Used Oil, June 2007 analysis of volatiles in several of the coating wastes and caustic stripping waste, and a December 2001 profile of "spent solvents" (determined as D001, D035, F003, and F005).

The facility also provided an MSDS of the "ZEP Powerhouse" cleaner found in the Main Mix Area, which shows a closed cup flashpoint of 84.9°F (Attachment 6).

6.7 NMP Storage

According to the facility the NMP tank was installed around June or July of 2010. Spent NMP from the tank goes to either Univar, Chemsolv or Brenntag. These facilities will typically remove the glycol and water to recover NMP for reuse. Mr. Lane stated that according to Brenntag, the NMP is non-HW. See Attachment 7 for an MSDS of NMP, which states that the flashpoint is 205°F and it is not classified under RCRA. Also included are two bills of lading showing shipment of the spent NMP material.

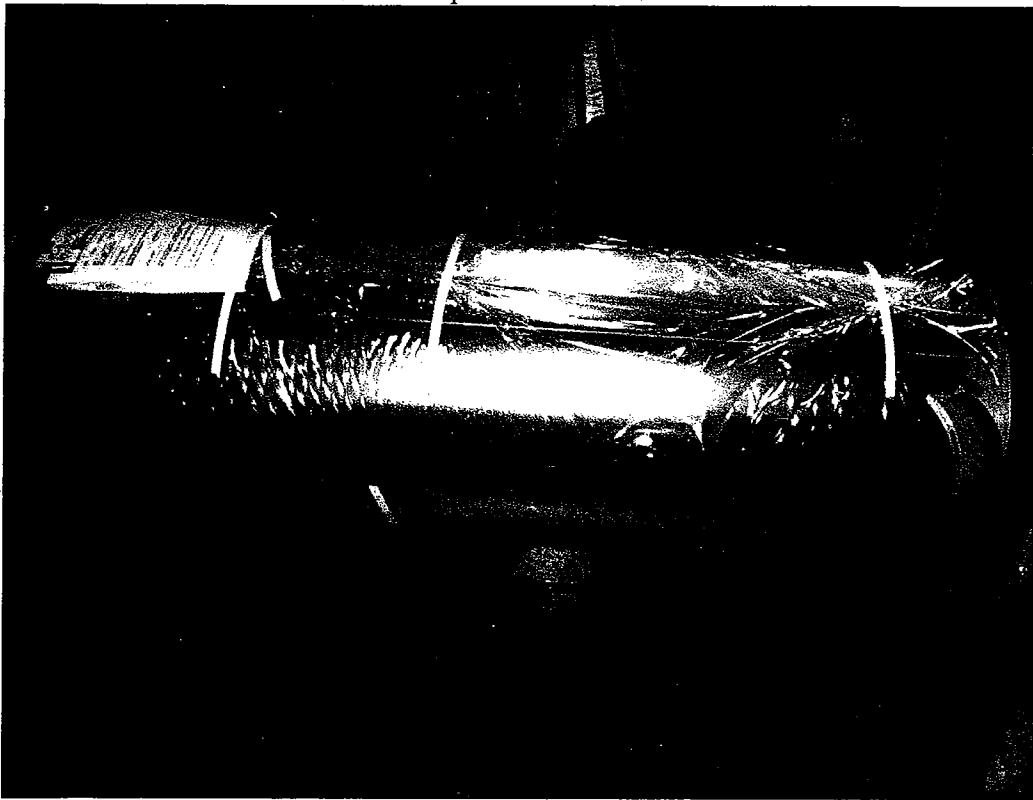
6.8 Vapor Recovery Solvents

The facility representative stated that up until two months prior to the inspection, the solvents generated from the vapor recovery unit were typically disposed of as HW. However, it was also stated that prior to early 2009 Blue Ridge Solvents & Coatings, Inc. ("Blue Ridge") would purchase the solvent from CLC. According to CLC, Blue Ridge contacted the facility in October 2009 to arrange for pickup of the solvent drums for direct reuse as parts cleaners. Since that time, five 55gal drums of the solvent were shipped to Blue Ridge on 11/3/10. Please see Attachment 8 for a copy of the bill of lading, which faintly shows the handwritten words "5 Reclaim" beneath the description of empty drums shipped at the same time. The facility's contact at Blue Ridge was recorded by the inspectors.

7.0 Attachments

1. Photographic log
2. Manifest #007514219
3. Weekly inspection logs for 1/5/10
4. Biennial Report for 2007
5. List of job titles and training database printout
6. MSDS for "ZEP Powerhouse"
7. MSDS and Bills of Lading for NMP
8. 11/3/10 Bill of Lading for solvent reclaim drums

Attachment #1



Photograph 1: Roll of clear raw material laminate

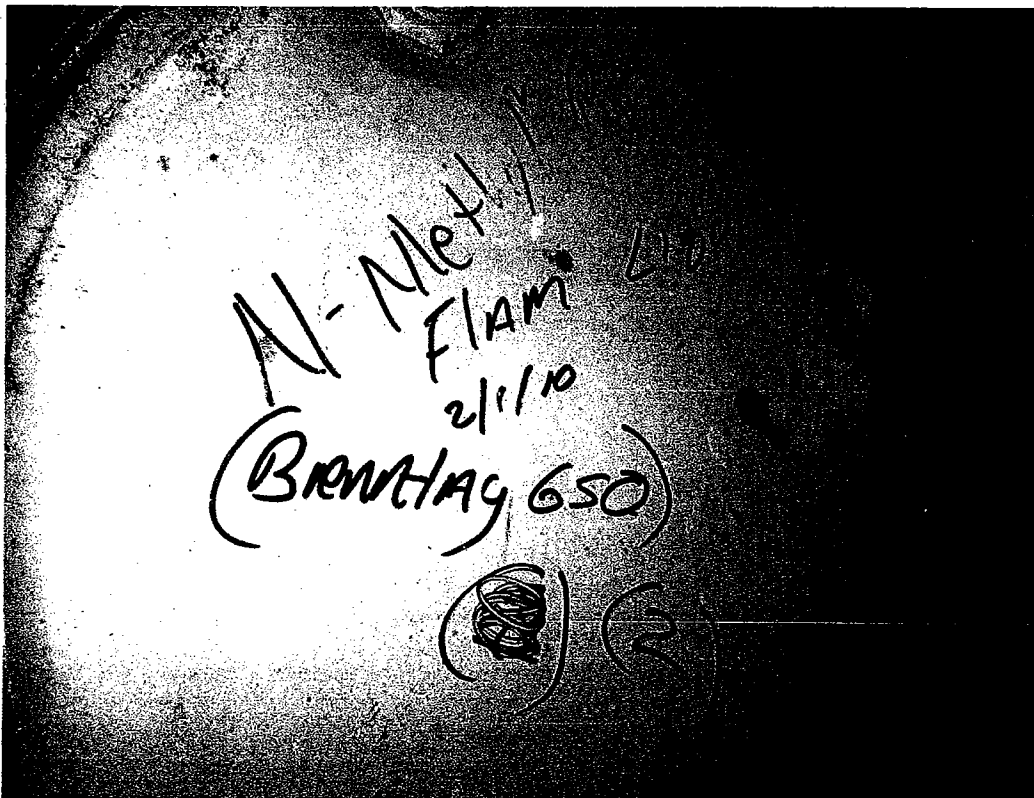


Photo 2: Top of 55gal drum found in "RCRA Accumulation Area #1," also labeled as non-Hazardous Waste (HW) on the side

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10



Photo 3: Overview of RCRA Accum. Area #1

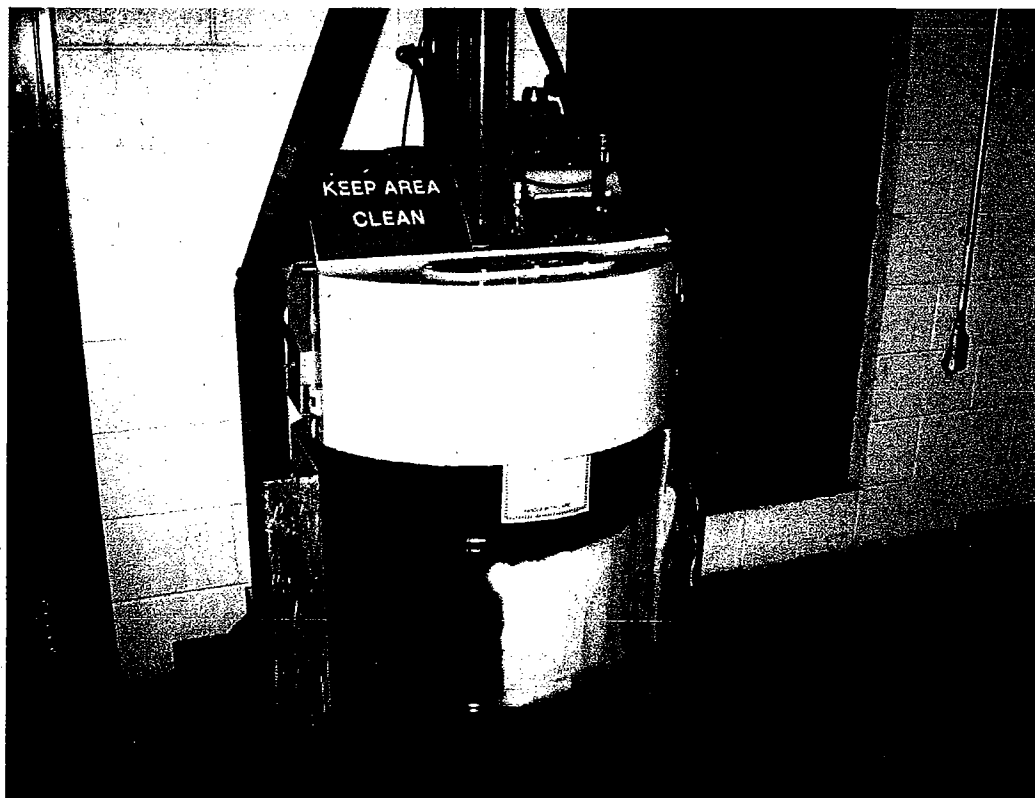


Photo 4: "RCRA Accumulation Area #2" containing dirty rag compressor connected to 55gal drum

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10



Photo 5: 55gal drum of HW caustic stripper found in Caustic Cleaner Room



Photo 6: 25gal red container of HW used rags in Caustic Cleaner Room with lid slightly ajar

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10



Photo 7: Contents of 25gal container in Photo 6



Photo 8: Side view of above container, showing gap below lid

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10

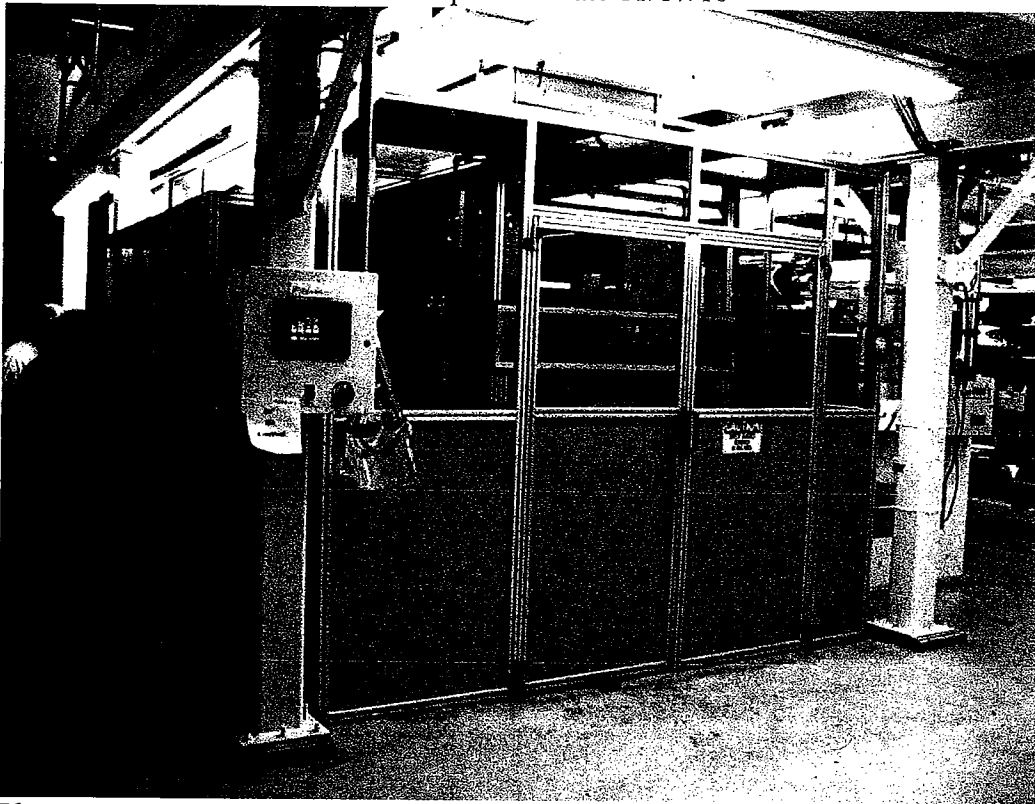


Photo 9: Enclosed Pressure-Sensitive Adhesive coating area within room for U72 line

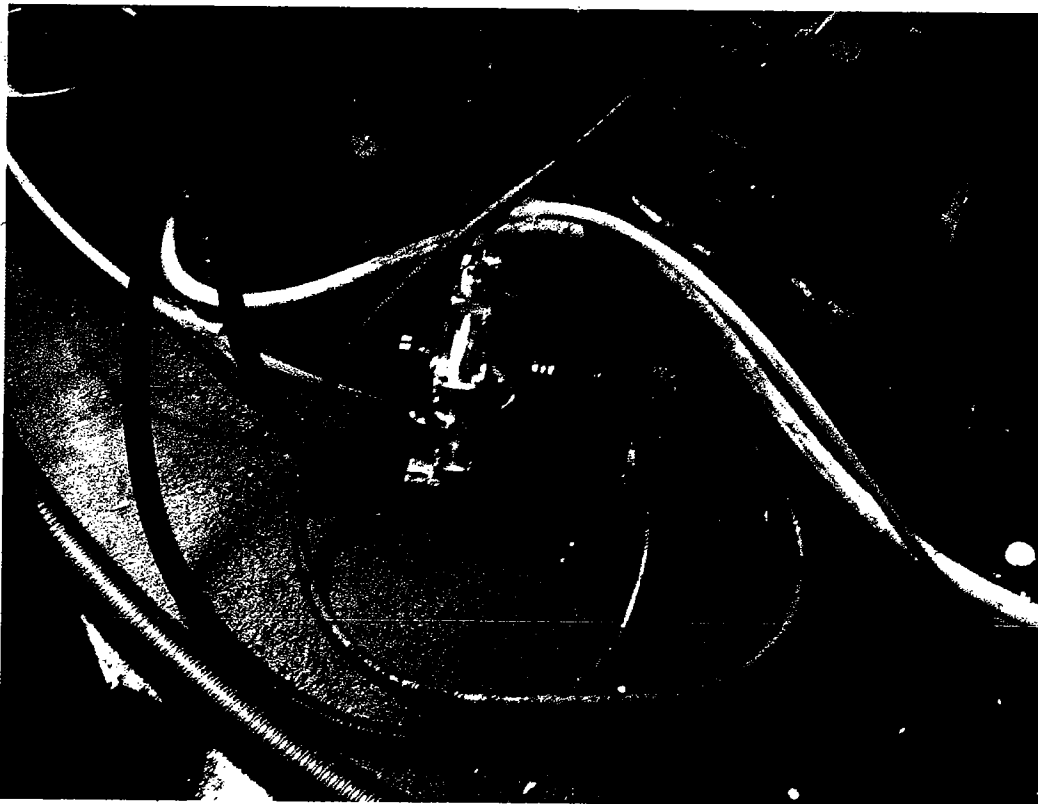


Photo 10: Pump on floor of Photo 9 enclosed coating area which pulls HW "refusal" into 55gal drum, also in enclosed room, during coating process

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10



Photo 11: 55gal drum within Photo 9 enclosed coating area, w/open bung and tube running from pump in Photo 10

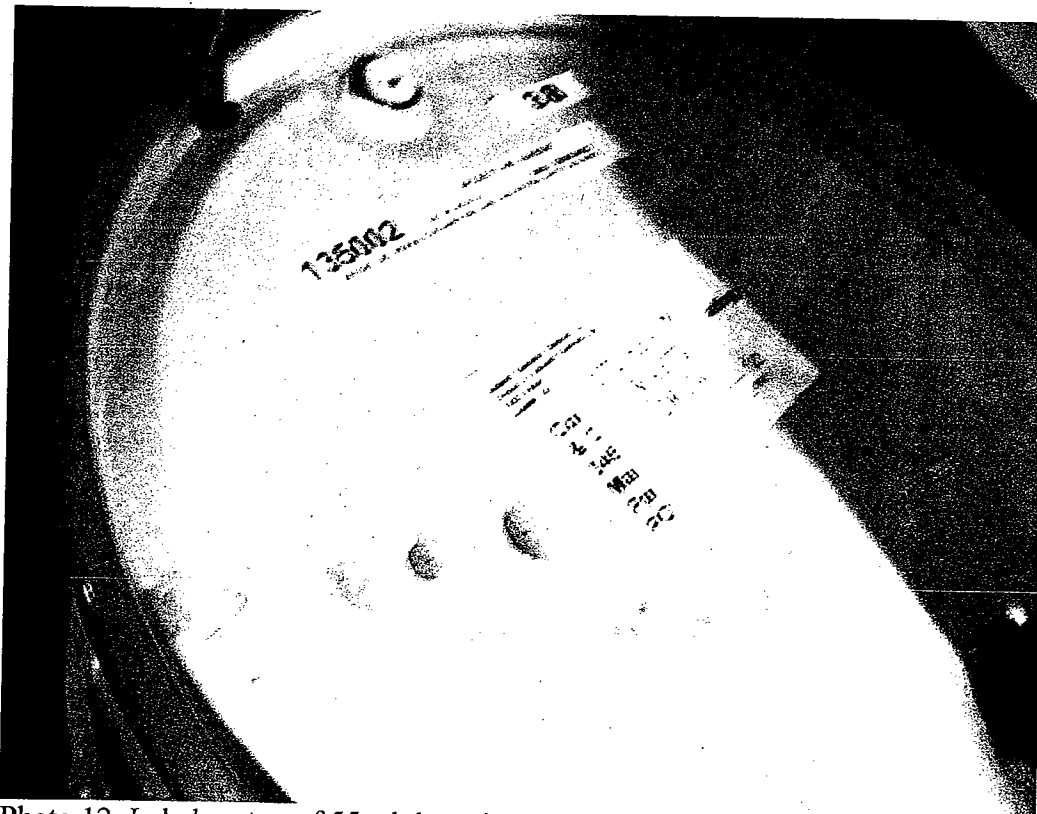


Photo 12: Label on top of 55gal drum in enclosed Scratch-Resistant Coating area in U72 room -- labeled "U72 Heavy Waste Drum" (same as Photo 11 drum)

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10

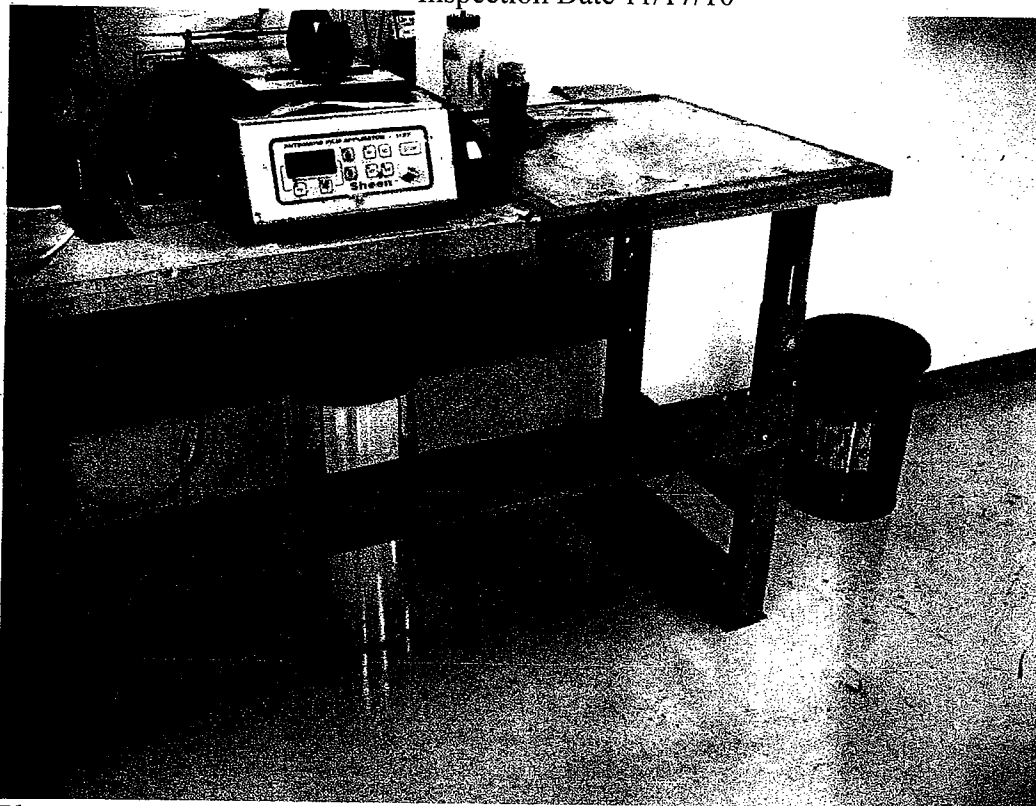


Photo 13: Lab workstation where MEK is used to clean rods -- unlabeled 5gal can on right

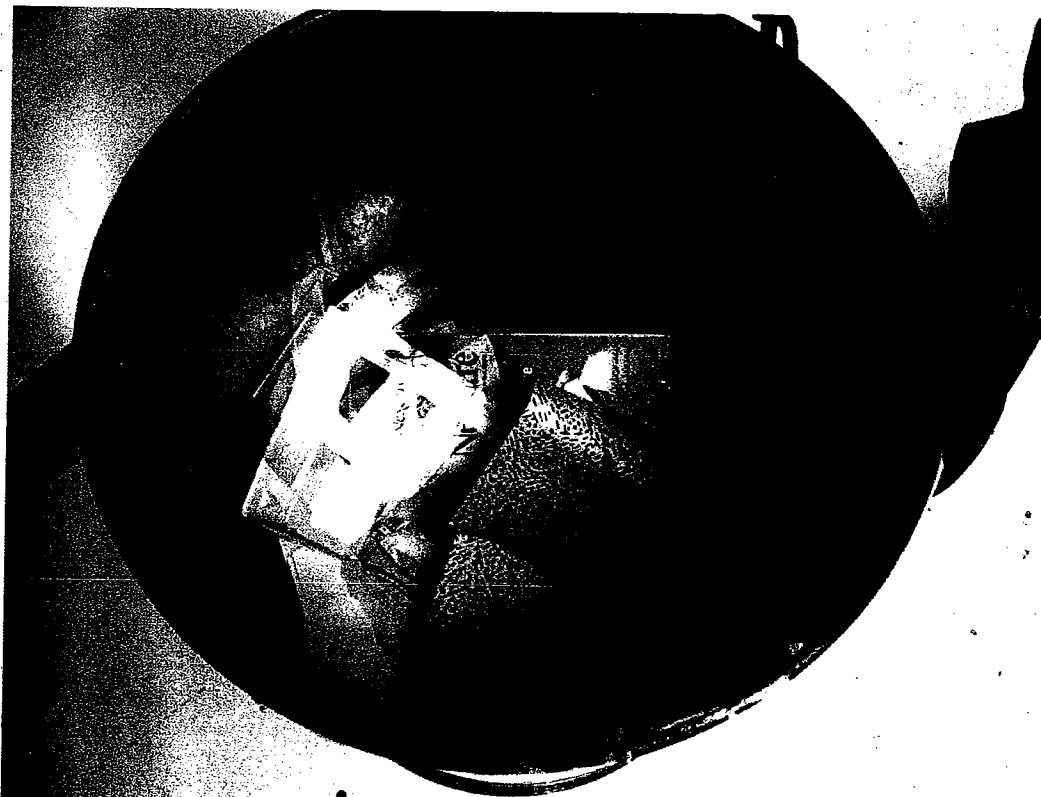


Photo 14: Contents of 5gal can in Photo 13, with some spent MEK rags found inside

JUSTRITE

OILY WASTE CAN

AM APPROVED SAFETY PRODUCT

CAPACITY
19 GALLONS
72 LITERS

EMPTY EVERY NIGHT

VACIELO TODAS LAS NOCHES

VIDER TOUS LES SOIRS

#2



Photo 17: 10gal container of HW rags w/open lid and material coming out, in U73 Pressure-Sensitive coating room



Photo 18: 10gal HW container found in Polyester Dye Room with open lid



Photo 19: Contents of Photo 18 can

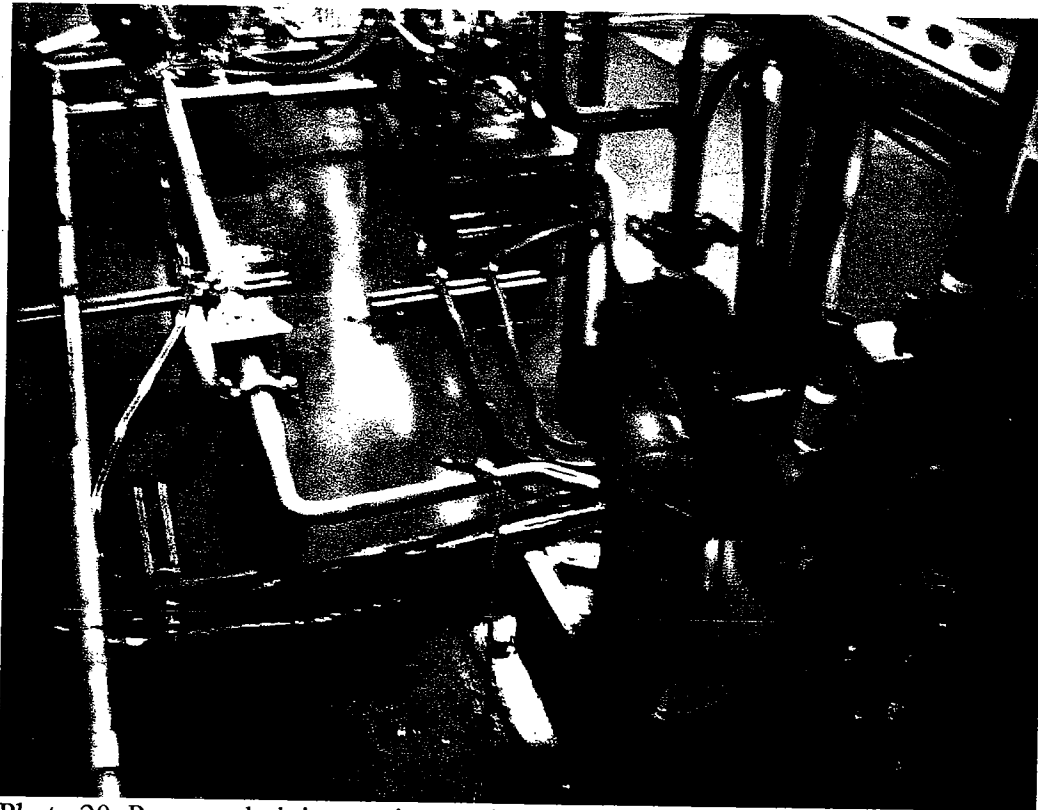


Photo 20: Pump and piping equipment in Polyester Dyeing room to convey waste n-methyl-pyrrolidone (NMP) to outside tank

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10

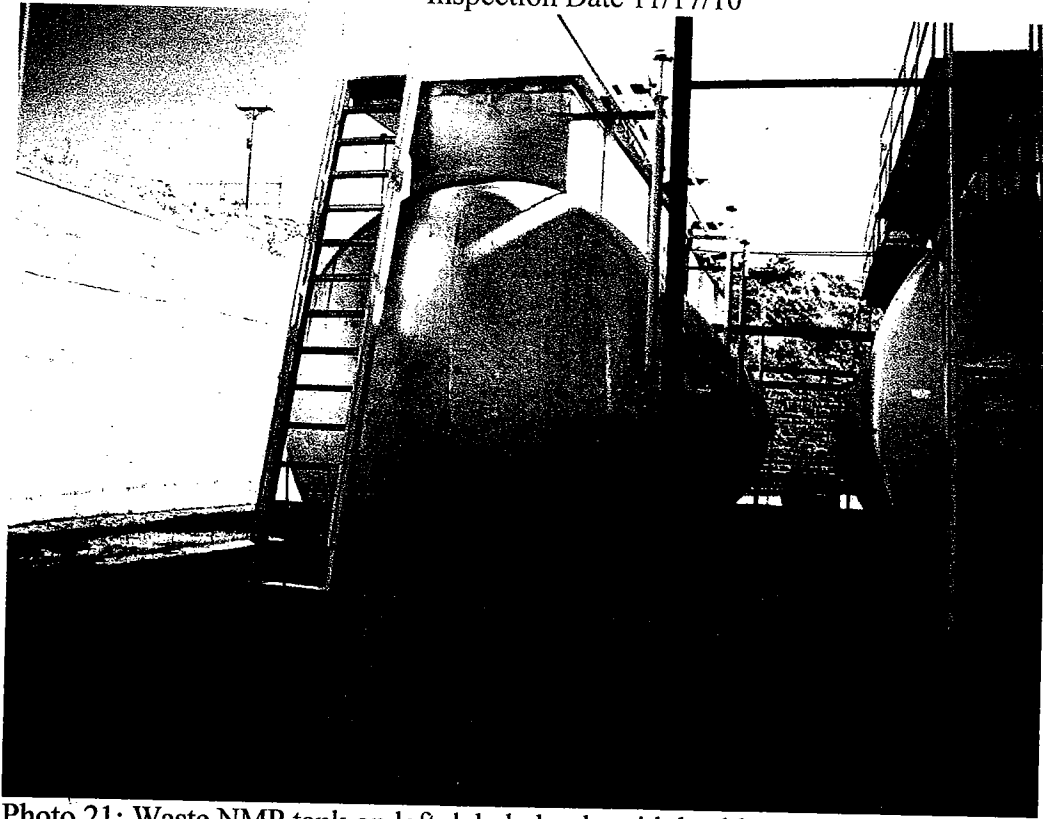


Photo 21: Waste NMP tank on left, labeled only with health & safety chart ("Health-1, Flammability-1, Reactivity-0")

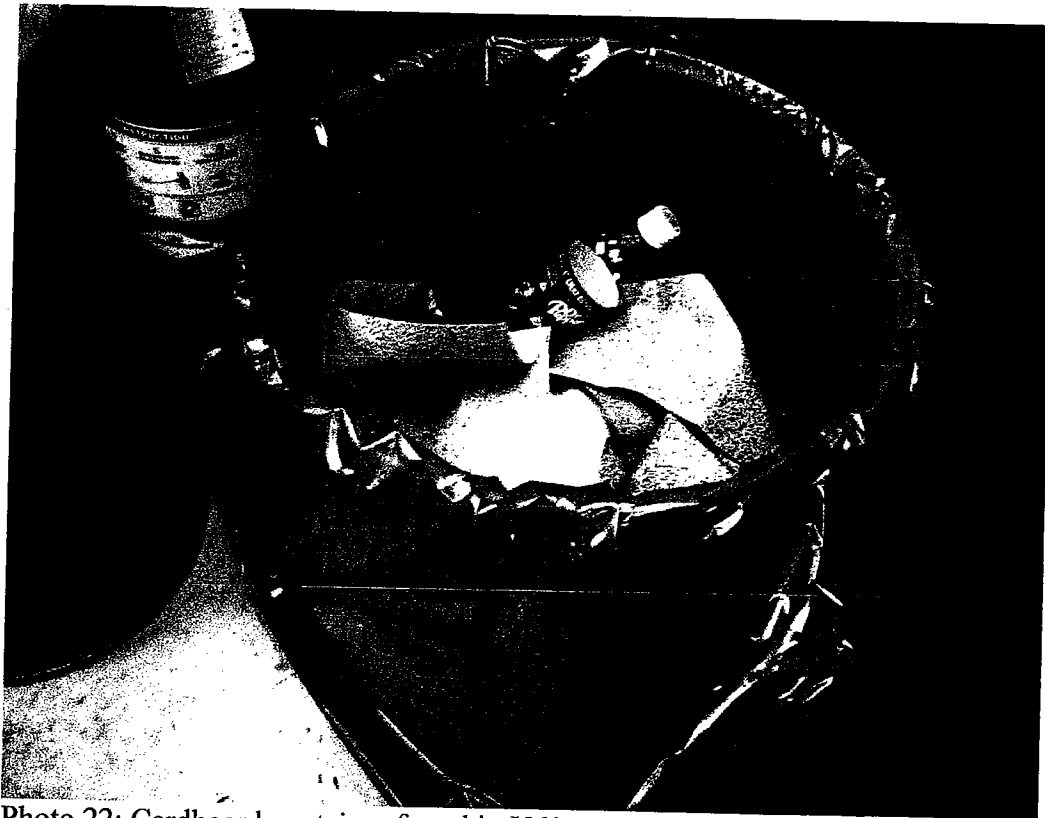


Photo 22: Cardboard container found in U60 room, open and unlabeled -- smelled like isopropyl alcohol

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10

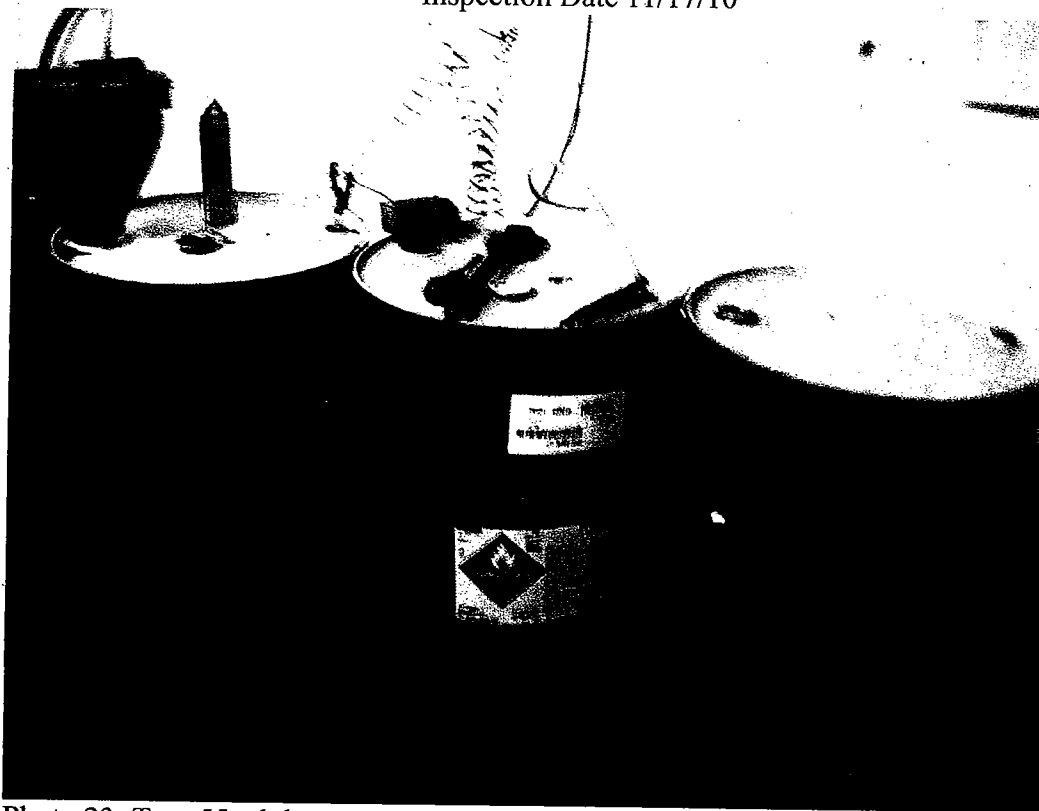


Photo 23: Two 55gal drums on left contain waste solvent generated by vapor recovery unit on other side of wall -- middle drum w/open bungs and tube coming through wall; both labeled only w/original toluene stickers. Right drum empty.

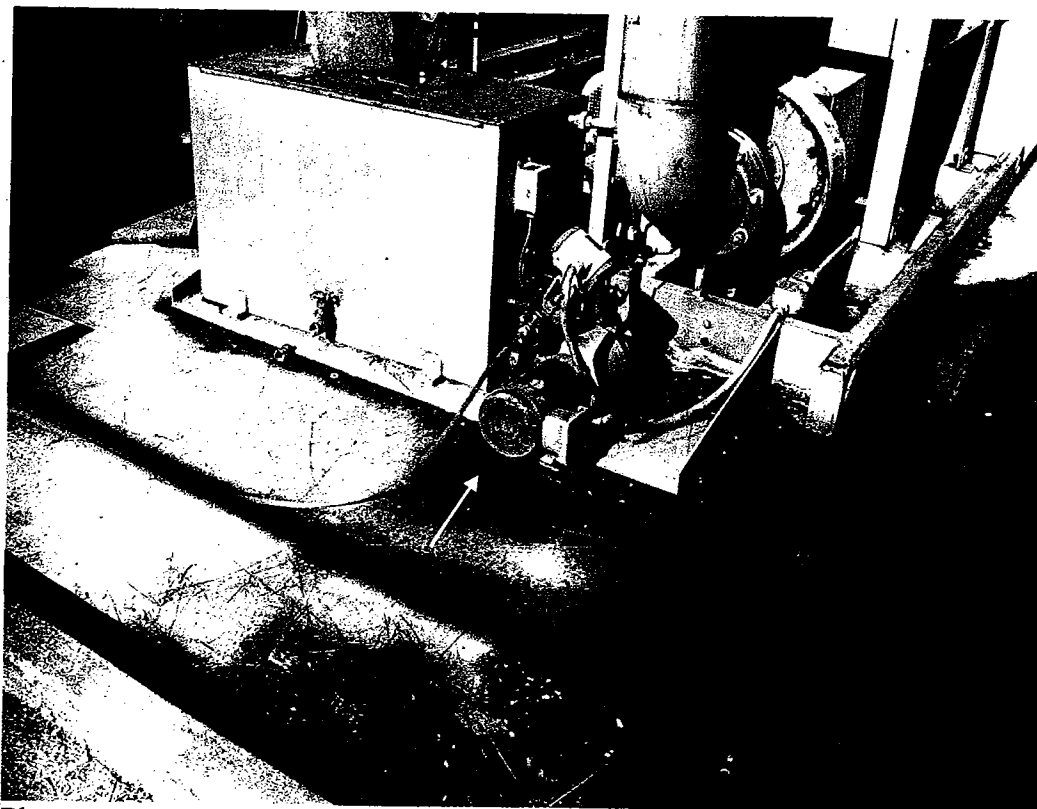


Photo 24: Pump (at arrow) connected to vapor recovery unit, with tube leading through wall to middle drum in Photo 23

Photographic Log
Commonwealth Laminating & Coating, Inc. VAR000008433
Inspection Date 11/17/10

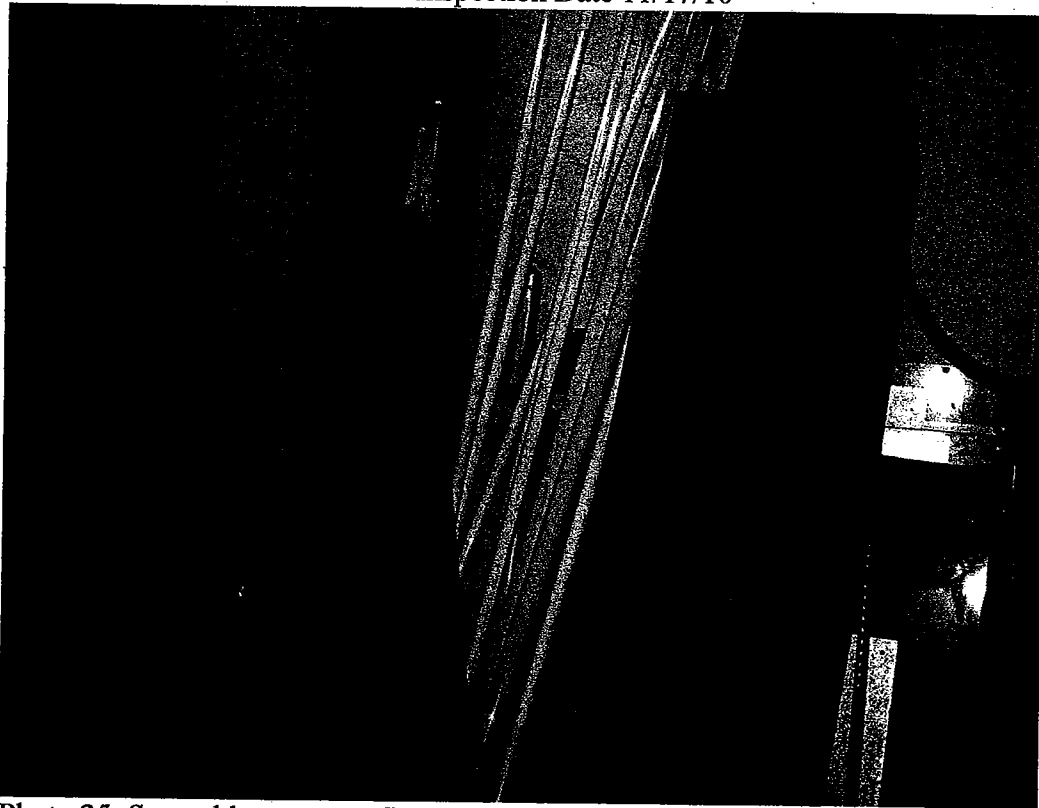


Photo 25: Several loose spent fluorescent lamps, along with six open, unlabeled boxes of spent lamps found in Boiler Room for U60 line

Attachment #2

338129

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

ORDER # 562771

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number VA2000009433	2. Page 1 of 1	3. Emergency Response Phone 800-535-5053	4. Manifest Tracking Number 007514219 JJK			
5. Generator's Name and Mailing Address COMMONWEALTH LAMINATING ATTN: BARRY HYLTON 345 BEAVER CREEK DRIVE, MARTINSVILLE, VA 24115				Generator's Site Address (if different than mailing address) COMMONWEALTH LAMINATING 345 BEAVER CREEK DRIVE MARTINSVILLE, VA 24112				
Generator's Phone: 276 632-4091								
6. Transporter 1 Company Name UNIVAR USA INC.				U.S. EPA ID Number GAD980845077				
7. Transporter 2 Company Name DUPRE LOGISTICS LLC				U.S. EPA ID Number LAR000045963				
8. Designated Facility Name and Site Address GIANT RESOURCE RECOVERY - SUMTER 755 INDUSTRIAL ROAD SUMTER, SC 29150				U.S. EPA ID Number SCD036275526				
Facility's Phone: 877-473-5554								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, WASTE FLAMMABLE LIQUIDS, N.O.S. (TOLUENE, METHYL ETHYL KETONE) 2, UN1993, PG II, (RQ=100), (ERG#128)			20 DM		1000	G	D001 D035 F003 F005
	2.							
	3.							
	4.							
14. Special Handling Instructions and Additional Information 1. SE-46848 PLACARDS PROVIDED BY CARRIER/SHIPPER YES/NO DRIVER SIGNATURE <i>Chris Seir</i> **** ER CALLER MUST IDENTIFY UNIVAR USA AS REGISTRANT ****								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Officer's Printed/Typed Name Charles T. Clark				Signature <i>Charles T. Clark</i>		Month Day Year		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name Guy Lawless				Signature <i>Guy Lawless</i>		Month Day Year 11 03 10		
Transporter 2 Printed/Typed Name Chris Gains				Signature <i>Chris Gains</i>		Month Day Year 11 13 10		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection 7348#								
18b. Alternate Facility (or Generator) Manifest Reference Number: U.S. EPA ID Number								
Facility's Phone:								
18c. Signature of Alternate Facility (or Generator) Month Day Year								
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H001		2.		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a								
Printed/Typed Name Robert Sellers				Signature <i>Robert Sellers</i>		Month Day Year 11 10 10		

Attachment #3

HAZARDOUS WASTE INSPECTION WEEKLY

Date: 1/5/10Time: 4:15Name of Individual performing inspection: B. Law

U60 Machine:

	Yes	No	Comments
1 Waste Drum found	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2 Cleaning Solvent Drum	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Waste Drum Labelled Properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Cleaning Solvent Drum Labelled Properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
All Solvent Containing vessels have grounding rods-In Coater	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
All Solvent Containing vessels have grounding rods-Outside Coater	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Funnel latched on the Waste Drum	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
All vessels labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
All vessels with lid?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Spill Kit found in proper condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are there 2 waste drums in U60 m/c	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
If yes, Check the date. Has it been 72 hrs since date on the drum	<input type="checkbox"/>	<input type="checkbox"/>	<u>NA</u>
Are there multiple labels on drum?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Any Buckets with Solvent laden rags open?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
All Work in Process buckets covered & labelled	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Any solvent drums found open	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Miscellaneous			

Vapor Recovery Section:

	Yes	No	Comments
2 Vapor Collection drum found	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Label properly filled on each drum?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Funnel latched & in proper condition next to caustic drum	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Waste Drum Labelled properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Are there multiple labels on drum?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Any Buckets with Solvent laden rags open?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
All Work in Process buckets covered & labelled	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Miscellaneous

Compactor:

	Yes	No	Comments
Check the date on Compactor is it more than 90 days from date on the drum	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Old Mix Room:

	Yes	No	Comments
Waste Drum In Room	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Funnels latched & in proper condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Waste Drum Labelled properly	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Caustic Stripper waste properly labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Are there multiple labels on drum?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	Comments
Any Buckets with Solvent laden rag found open?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	Comments
All Work in Process buckets covered & labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Any solvent drums found open	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

Miscellaneous

90 Days Accumulation Area:

	Yes	No	Comments
No of Open Top Waste			<u>828</u>

	Yes	No	Comments
No of Closed Top Waste			<u>0</u>

	Yes	No	Comments
Spill Kit present & in proper condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Evidence of Corrosion	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	Comments
Evidence of Leak	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	Comments
Dented/Crushed/Punctured	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	Comments
Closed light	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Properly Marked & Clearly visible	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Is area blocked	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Yes	No	Comments
All the drums properly labelled	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Miscellaneous

Dumpster:

	Yes	No	Comments
Are Dumpsters Covered	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

U72 Machine/SR Coater:

	Yes	No	Comments
1 Waste Drum found	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
1 Cleaning Solvent Drum	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Waste Drum Labelled Properly ?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Cleaning Solvent Drum Labelled Properly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
All Solvent Containing vessels have grounding rods-In Coater	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
All Solvent Containing vessels have grounding rods-Outside Coater	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Funnel latched on the Waste Drum	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
All vessels labeled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
All vessels with lid?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Spill Kit found in proper condition	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

	Yes	No	Comments
Are there 2 waste drums in U72 SR?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

If yes, Check the date, Has it been 72 hrs since date on the drum ☐ Yes ☐ No NA

Are there multiple labels on any drum? ☐ Yes ☒ No

Any Buckets with Solvent laden rag found open? ☐ Yes ☒ No

All Work in Process buckets covered & labeled? ☒ Yes ☐ No

Any solvent drums found open? ☐ Yes ☒ No

Miscellaneous

U72 Machine/PS Coater:

1 Waste Drum found ☒ Yes ☐ No

1 Cleaning Solvent Drum ☒ Yes ☐ No

Waste Drum Labeled Properly? ☒ Yes ☐ No

Cleaning Solvent Drum Labeled Properly? ☒ Yes ☐ No

All Solvent Containing vessels have grounding rods-In Coater ☒ Yes ☐ No

All Solvent Containing vessels have grounding rods-Outside Coater ☒ Yes ☐ No

All vessels labeled? ☒ Yes ☐ No

All vessels with lid? ☒ Yes ☐ No

Spill Kit found in proper condition ☒ Yes ☐ No

Are there 2 waste drums in U72 PS? ☐ Yes ☒ No

If yes, Check the date, Has it been 72 hrs since date on the drum ☐ Yes ☐ No NA

Are there multiple labels on any drum? ☐ Yes ☒ No

Any Buckets with Solvent laden rag found open? ☐ Yes ☒ No

All Work in Process buckets covered & labeled? ☒ Yes ☐ No

Any solvent drums found open ☐ Yes ☒ No

Miscellaneous

Universal Waste:

Is all the waste in boxes ☒ Yes ☐ No

Are the boxes properly labelled ☒ Yes ☐ No

Is the date less than a year ☒ Yes ☐ No

Are all the boxes closed ☒ Yes ☐ No

Miscellaneous

New Mix Room:

All Solvent drums closed ☒ Yes ☐ No

1 Waste Drum found ☒ Yes ☐ No

Waste Drum Labeled Properly ☒ Yes ☐ No

Funnel latched on the Waste Drum ☒ Yes ☐ No

All vessels labeled? ☒ Yes ☐ No

All vessels with lid? ☒ Yes ☐ No

All Work in Process buckets covered & labelled ☒ Yes ☐ No

Miscellaneous

U73 Machine/SR Coater:

1 Waste Drum found ☒ Yes ☐ No

1 Cleaning Solvent Drum ☒ Yes ☐ No

Waste Drum Labeled Properly? ☒ Yes ☐ No

Cleaning Solvent Drum Labeled Properly? ☒ Yes ☐ No

All Solvent Containing vessels have grounding rods-In Coater ☒ Yes ☐ No

All Solvent Containing vessels have grounding rods-Outside Coater ☒ Yes ☐ No

Funnel latched on the Waste Drum ☒ Yes ☐ No

All vessels labeled? ☒ Yes ☐ No

All vessels with lid? ☒ Yes ☐ No

Spill Kit found in proper condition ☒ Yes ☐ No

Are there 2 waste drums in U73 SR? ☐ Yes ☒ No

If yes, Check the date, Has it been 72 hrs since date on the drum ☐ Yes ☐ No NA

Are there multiple labels on any drum? ☐ Yes ☒ No

Any Buckets with Solvent laden rag found open? ☐ Yes ☒ No

All Work in Process buckets covered & labeled? ☒ Yes ☐ No

Any solvent drums found open? ☐ Yes ☒ No

Miscellaneous

U73 Machine/PS Coater:

1 Waste Drum found ☒ Yes ☐ No

1 Cleaning Solvent Drum ☒ Yes ☐ No

Waste Drum Labeled Properly? ☒ Yes ☐ No

Cleaning Solvent Drum Labeled Properly? ☒ Yes ☐ No

All Solvent Containing vessels have grounding rods-In Coater ☒ Yes ☐ No

All Solvent Containing vessels have grounding rods-Outside Coater ☒ Yes ☐ No

All vessels labeled? ☒ Yes ☐ No

All vessels with lid? ☒ Yes ☐ No

Spill Kit found in proper condition ☒ Yes ☐ No

Are there 2 waste drums in U73 PS? ☐ Yes ☒ No

If yes, Check the date, Has it been 72 hrs since date on the drum ☐ Yes ☐ No NA

Are there multiple labels on any drum? ☐ Yes ☒ No

Any Buckets with Solvent laden rag found open? ☐ Yes ☒ No

All Work in Process buckets covered & labeled? ☒ Yes ☐ No

Any solvent drums found open ☐ Yes ☒ No

Miscellaneous

Attachment #4

**DECLARATION OF ELECTRONIC FILING OF THE
2007 ANNUAL HAZARDOUS WASTE REPORT**

For the calendar year January 1, 2007, through December 31, 2007

EPA ID VAR000008433

Site/Company Name COMMONWEALTH LAMINATING AND COATING, INC.

Site Address 345 BEAVER CREEK DRIVE

City MARTINSVILLE State VA Zip 24112

Mailing Address PO BOX 4668

City MARTINSVILLE State VA Zip 24115

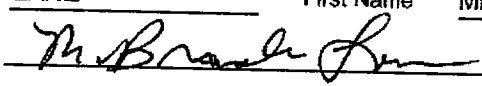
Contact Name BRANDON LANE Phone No 2766324991 Ext 244

Contact Title _____

Part I - Declaration of Filer

I certify under penalty of law that the information shown on my 2007 Hazardous Waste Report, which I filed electronically, and that this document and all attachments were prepared under my direction or supervision, in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted, is correct and current. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties under Section 3008 of the Resource Conservation and Recovery Act for submitting false information, including the possibility of fine and imprisonment for known violations.

Part II - Signature of Certification

Last Name LANE First Name MICHAEL Title PRODUCT DEVELOPMENT
Signature  ENGINEER
Date 2/29/2008

Part III - Method of File Transmittal

☐ 3 1/2" Diskette or CD ☐ Email ☒ ARM Web Site

**** Note:** This is not the 2007 Annual Hazardous Waste Report. Only file this form if you submitted your 2007 Annual Hazardous Waste Report electronically. This form alone does not constitute submittal of the 2007 Hazardous Waste Report but is required for all methods of electronic submission of the report.

SEND COMPLETED FORM TO: The Appropriate State or EPA Regional Office	United States Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION FORM (2007)		
1. Reason for Submittal MARK ALL BOX(ES) THAT APPLY	Reason for Submittal: <input type="checkbox"/> To provide initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, Universal waste, or used oil activities). <input type="checkbox"/> To provide Subsequent Notification of Regulated Waste Activity (to update site identification information). <input type="checkbox"/> As a component of a First RCRA Hazardous Waste Part A Permit Application. <input type="checkbox"/> As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____) <input checked="" type="checkbox"/> As a component of the Hazardous Waste Report.		
2. Site EPA ID Number	EPA ID Number: VAR000008433		
3. Site Name	Name: COMMONWEALTH LAMINATING AND COATING, INC.		
4. Site Location Information	Street Address: 345 BEAVER CREEK DRIVE City, Town, or Village: MARTINSVILLE State: VA County Name: MARTINSVILLE CITY Zip Code: 24112		
5. Site Land Type	Site Land Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
6. NAICS Code(s) for the Site	A. 32613 B. C. D.		
7. Site Mailing Address	Street or P. O. Box: PO BOX 4668 City, Town, or Village: MARTINSVILLE State: VA Country: UNITED STATES Zip Code: 24115		
8. Site Contact Person	First Name: BRANDON MI: Last Name: LANE Phone Number: 2766324991 Extension: 244 Email Address: blane@windowfilm.net		
9. Operator and Legal Owner of the Site	A. Name of Site's Operator: COMMONWEALTH LAMINATING AND COATING, INC Date Became Operator: 12/14/1995 Operator Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		
	B. Name of Site's Legal Owner: COMMONWEALTH LAMINATING AND COATING, INC Date Became Owner: 4/30/2006 Owner Type: <input checked="" type="checkbox"/> Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input type="checkbox"/> State <input type="checkbox"/> Other		

9. Legal Owner Address (continued)	Street or P. O. Box: PO BOX 4668	
	City: MARTINSVILLE	State: VA
	Country: UNITED STATES	Zip Code: 24115

10. Type of Regulated Waste Activity
Mark Yes or No for all activities; complete any additional boxes as instructed.

A. Hazardous Waste Activities

Complete all parts for 1 through 6.

☐ ☒ 1. Generator of Hazardous Waste

If Yes, choose only one of the following - a, b, or c.

- ☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or
- ☐ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

☐ ☒ d. United States Importer of Hazardous Waste

☐ ☒ e. Mixed Waste (hazardous and radioactive) Generator

☐ ☒ 2. Transporter of Hazardous Waste

☐ ☒ 3. Treater, Storer, or Disposer of Hazardous Waste (at your site)

Note: A hazardous waste permit is required for this activity.

☐ ☒ 4. Recycler of Hazardous Waste (at your site)

☐ ☒ 5. Exempt Boiler and/or Industrial Furnace
If Yes, mark each that applies.

- ☐ a. Small Quantity On-site Burner Exemption
- ☐ b. Smelting, Melting, and Refining Furnace

☐ ☒ 6. Underground Injection Control

B. Universal Waste Activities

☐ ☒ 1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste mark all boxes that apply:

Generate Managed

- | | | |
|---------------------------------|--------------------------|--------------------------|
| a. Batteries | | <input type="checkbox"/> |
| b. Pesticides | | <input type="checkbox"/> |
| c. Mercury containing equipment | | <input type="checkbox"/> |
| d. Lamps | | <input type="checkbox"/> |
| e. Other (specify) | <input type="checkbox"/> | <input type="checkbox"/> |
| f. Other (specify) | <input type="checkbox"/> | <input type="checkbox"/> |
| g. Other (specify) | <input type="checkbox"/> | <input type="checkbox"/> |

☐ ☒ 2. Destination Facility for Universal Waste

Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities

Mark all boxes that apply

☐ ☒ 1. Used Oil Transporter
If Yes, mark each that applies.

- ☐ a. Transporter
- ☐ b. Transfer Facility

☐ ☒ 2. Used Oil Processor and/or Re-refiner
If Yes, mark each that applies.

- ☐ a. Processor
- ☐ b. Re-refiner

☐ ☒ 3. Off-Specification Used Oil Burner

☐ ☒ 4. Used Oil Fuel Marketer

If Yes, mark each that applies.

- ☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner
- ☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes**A. Waste Codes for Federally Regulated Hazardous Wastes.**

Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

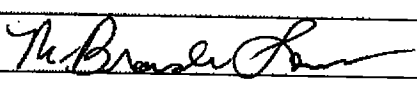
D001 D002 D035 F003 F005

B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes.

Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments**13. Certification**

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature of Operator, Owner, or an Authorized Representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	MICHAEL B. LANE, PRODUCT DEVELOPMENT ENGINEER	02/29/2008
	MATT PHILLIPS, VICE PRESIDENT OF OPERATIONS	02/29/2008

BEFORE COPYING FORM, ATTACH SITE
IDENTIFICATION LABEL OR ENTER

SITE NAME: COMMONWEALTH LAMINATING AND
COATING, INC.
EPA ID NO: VAR000008433

FORM
GM

US ENVIRONMENTAL
PROTECTION AGENCY
2007 HAZARDOUS WASTE REPORT
WASTE GENERATION AND
MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form

SEC. 1	A. Waste description IGNITABLE SPENT SOLVENT FROM LINE FLUSHING, CLEANUP AND SOLVENT RECOVERY OPERATIONS: A MIXTURE OF ETHYL ACETATE, TOLUENE, N-BUTYL ACETATE, PM ACETATE, ISOPROPYL ALCOHOL, ADHESIVE, AND MONOMER		
B. EPA hazardous waste code D001 D035 F003 F005		C. State hazardous waste code	
D. Source code G07 Management method code for source code G25	E. Form code W203	F. Quantity generated in 2007 315891.0	G. UOM 1 <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg
SEC. 2	Was any of this waste managed on site? <input type="checkbox"/> 1. Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> 2. No (SKIP TO SEC.3)		
	On-site management method code	Quantity treated, disposed, or recycled on site in 2007	
ON-SITE PROCESS 1			
ON-SITE PROCESS 2			
SEC. 3	A. Was any of this waste shipped off site in 2007 for treatment, disposal, or recycling? <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (FORM IS COMPLETE)		
	B. EPA ID No. of facility to which waste was shipped	C. Off-site management method code shipped to	D. Total Quantity Shipped in 2007
SITE 1	SCD036275626	H061	315891.00
SITE 2			
SITE 3			
Comments:			

BEFORE COPYING FORM, ATTACH SITE
IDENTIFICATION LABEL OR ENTER

SITE NAME: COMMONWEALTH LAMINATING AND
COATING, INC.

EPA ID NO: VAR000008433

FORM
GM

US ENVIRONMENTAL
PROTECTION AGENCY

2007 HAZARDOUS WASTE REPORT

WASTE GENERATION AND
MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form

SEC. 1	A. Waste description IGNITIBLE SOLID WASTE IN THE FORM OF SOLVENT SOAKED RAGS USED DURING CLEANING. SOLVENT MAY BE TOLUENE, MEK, ISOPROPYL ALCOHOL		
B. EPA hazardous waste code D001 D035 F003 F005		C. State hazardous waste code	
D. Source code G01 Management method code for source code G25	E. Form code W002	F. Quantity generated in 2007 2328.0	G. UOM 1 Density <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg
SEC. 2	Was any of this waste managed on site? <input type="checkbox"/> 1. Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> 2. No (SKIP TO SEC.3)		
	On-site management method code	Quantity treated, disposed, or recycled on site in 2007	
ON-SITE PROCESS 1			
ON-SITE PROCESS 2			
SEC. 3	A. Was any of this waste shipped off site in 2007 for treatment, disposal, or recycling? <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (FORM IS COMPLETE)		
	B. EPA ID No. of facility to which waste was shipped	C. Off-site management method code shipped to	D. Total Quantity Shipped in 2007
SITE 1	TND000772186	H141	2328.00
SITE 2			
SITE 3			
Comments:			

BEFORE COPYING FORM, ATTACH SITE
IDENTIFICATION LABEL OR ENTER

SITE NAME: COMMONWEALTH LAMINATING AND
COATING, INC.

EPA ID NO: VAR000008433

FORM
GM

US ENVIRONMENTAL
PROTECTION AGENCY

2007 HAZARDOUS WASTE REPORT

WASTE GENERATION AND
MANAGEMENT

Instructions: Please see the detailed instructions beginning on page 19 of the instructions and forms booklet before completing this form

SEC. 1	A. Waste description IGNITABLE SPENT CAUSTIC CLEANER CONSISTING OF ISOPROPYL ALCOHOL AND POTASSIUM HYDROXIDE USED IN STRIPPING RESIDUAL ADHESIVE FROM CYLINDERS.		
B. EPA hazardous waste code D001 D002		C. State hazardous waste code	
D. Source code G02 Management method code for source code G25	E. Form code W219	F. Quantity generated in 2007 24270.0	G. UOM 1 Density <input type="checkbox"/> 1 lbs/gal <input type="checkbox"/> 2 sg
SEC. 2	Was any of this waste managed on site? <input type="checkbox"/> 1. Yes (CONTINUE TO ON-SITE PROCESS SYSTEM 1) <input checked="" type="checkbox"/> 2. No (SKIP TO SEC.3)		
	On-site management method code	Quantity treated, disposed, or recycled on site in 2007	
ON-SITE PROCESS 1			
ON-SITE PROCESS 2			
SEC. 3	A. Was any of this waste shipped off site in 2007 for treatment, disposal, or recycling? <input checked="" type="checkbox"/> 1 Yes (CONTINUE TO BOX B) <input type="checkbox"/> 2 No (FORM IS COMPLETE)		
	B. EPA ID No. of facility to which waste was shipped	C. Off-site management method code shipped to	D. Total Quantity Shipped in 2007
SITE 1	TND000772186	H061	24270.00
SITE 2			
SITE 3			
Comments:			

Attachment #5

Training By Classification

Requirements

Management/Sales/Acct/Purchasing

Emergency Action Plan
Fire Extinguisher

Engineering/Maintenance

Emergency Action Plan
Fire Extinguisher
Lockout/Tagout
Forklift (Academic)
Personel Protective Equip.
Hazardous Communications
Hazardous Waste 40 CFR 265.16(a) (2)
Dot Hazardous Materials 49 CFR 172.704
Bloodborne Pathogens

Engineering Process/Coatings

Emergency Action Plan
Fire Extinguisher
Lockout/Tagout
Forklift (Academic)
Personel Protective Equip.
Hazardous Communications
Hazardous Waste 40 CFR 265.16(a) (2)
Dot Hazardous Materials 49 CFR 172.704
Bloodborne Pathogens

U-60/U72 Lines

Emergency Action Plan
Fire Extinguisher
Lockout/Tagout
Personel Protective Equip.
Hazardous Communications
Hazardous Waste 40 CFR 265.16(a) (2)
Forklift (Academic)
Bloodborne Pathogens

Mixing

Emergency Action Plan
Fire Extinguisher
Lockout/Tagout
Forklift (Academic)
Personel Protective Equip.
Hazardous Communications
Hazardous Waste 40 CFR 265.16(a) (2)
Dot Hazardous Materials 49 CFR 172.704
Bloodborne Pathogens

Packaging

Hazardous Communications
Emergency Action Plan
Fire Extinguisher
Lockout/Tagout
Forklift (Academic)
Personel Protective Equip.
Bloodborne Pathogens

Rewind

Hazardous Communications
Emergency Action Plan
Fire Extinguisher
Lockout/Tagout
Forklift (Academic)
Personel Protective Equip.
Bloodborne Pathogens

TRAINING STATUS

5/26/2010

8/22/2006	Hazard Recognition	Safety United
8/22/2006	Bloodborne Pathogens	Safety United
8/22/2006	Lockout/Tagout	Safety United
8/22/2006	Fire Extinguishers	Safety United
8/22/2006	Emergency Actions Plan	Safety United
8/22/2006	Hazardous Waste Management DOT Hazardous Materials	Safety United
8/22/2006	Personal Protective Equipment	Safety United
8/22/2006	Ppeppe - Forklift Safety Class	Safety United
8/22/2006	Work Practice First Aid	Safety United
8/22/2006	Forklift Accident	Safety United

6/24/2004	10/28/2009
6/24/2004	
6/24/2004	

[illegible]

Anderson, Michael

8/24/2006 6/21/2007
8/24/2006
8/24/2006 10/25/2007
8/24/2006 6/21/2007
8/24/2006 6/21/2007
8/24/2006 6/21/2007
8/24/2006 10/25/2007
9/4/2007
8/24/2006 7/10/2009
1/25/2007
5/15/2008

Arnold, Jim

3/20/2008
3/20/2008
3/20/2008
3/20/2008

Baker, Al

6/21/2007
6/21/2007
6/21/2007

7/31/2007
6/21/2007
6/21/2007
6/21/2007
6/21/2007
5/15/2008
9/4/2008

7/8/2009

Baldwin, Flora S.

7/22/2004 7/31/2007 7/10/2009
9/23/2004 10/25/2007
9/23/2004 10/25/2007
1/26/2005 10/25/2007
10/14/2005 10/25/2007
8/22/2006
8/22/2006

Hazard Communications Safety United

Lockout/Tagout

Fire Extinguisher

Emergency Actions Plan

Hazardous Waste Management

Personal Protective Equip.

Propane - Forklift Safety Class

DOT - Hazardous Materials

Confined Space Entry & Attendant Training

Scissor Lift Training

Hazard Communications Safety United
Bloodborne Pathogens Safety United
Fire Extinguisher Safety United
Emergency Actions Plan Safety United

Hazard Communications Safety United
Bloodborne Pathogens Safety United
Lockout/Tagout Safety United

Emergency Actions Plan Safety United
Hazardous Waste Safety United
Personal Protective Equip. Safety United
Respiratory Protection Voluntary Safety United

Scissor Lift Training Hertz
Reach Truck Atlantic Coast Toyota Lift

Fire Extinguisher Safety Alliance
Emergency Actions Plan Safety Alliance
Personal Protective Equip. Safety Alliance
Hazard Communications Safety United

Hazard Communications

Bloodborne Pathogens

Lockout/Tagout

Fire Extinguisher

Emergency Actions Plan

Personal Protective Equip.

Propane - Forklift Safety Class

Forklift/Accident

Hazardous Waste

40 CFR 268.16(a)(2)

5/18/2004	10/10/2005	
6/8/2004	10/25/2007	
6/8/2004	10/25/2007	
6/8/2004	11/23/2005	10/27/2009
6/8/2004	11/23/2005	10/27/2009
1/26/2005	10/25/2007	
6/28/2005		
10/10/2005		
	10/25/2007	

10/25/2007

Hazard Communications	Safety United
Bloodborne Pathogens	Safety United
Lockout/Tagout	Safety United
Fire Extinguisher	Safety United
& Contingency Plan	Safety United
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety United
Forklift Academic	Safety United

10/28/2009

Reach Truck Forklift Class 11 Atlantic Coast Toyota

Béche-Duin	8/22/2006
	8/22/2006
	8/22/2006
	8/22/2006
	8/22/2006
	9/26/2006
	8/22/2006
	8/22/2006
	8/22/2006

First Extinguishers	Safety United
Emergency Actions Plan	Safety United
Lockout/Tagout	Safety United
Forklift/Appeal	Safety United
Hazard Communications	Safety United
Personal Protective Equip	Safety United
Bloodborne Pathogens	Safety United

Bowling, Carl Allen	5/18/2004
	08/2004
	08/2004
	08/2004
	08/2004
	11/28/2005
	08/2004
	08/2004
	11/23/2005
	1/26/2005
	4/12/2005
	6/28/2005
	8/24/2005
	10/14/2005

Hazard Communications	Safety Alliance
Bloodborne Pathogens	Safety Alliance
Lockout/Tagout	Safety Alliance
Fire Extinguishers	Safety Alliance
Emergency Actions Plan	Safety Alliance
Personal Protective Equip.	Safety Alliance
Forklift/Certificat	Safety Alliance
Perpetrator	Safety Alliance
Welding	Safety Alliance
Hazard Communications	Safety Alliance

[illegible]

Firearm Contaminations	State/United
Identification Procedures	State/United
Field Diagnosis	State/United
Emergency Actions Plan	State/United
Personal Protective Equip	State/United
Respiratory Protection	State/United
Voluntary	State/United
For Kill/Arrest	State/United

Brandon, Margaret

6/8/2006 7/8/2009
8/24/2006
8/24/2006
8/24/2006
8/24/2006
8/24/2006
10/28/2009

Brazel, John

5/18/2004 8/1/2007
6/8/2004 8/24/2006
6/8/2004 3/29/2006
6/8/2004 11/23/2005
6/8/2004 11/23/2005
6/8/2004 10/27/2009
6/9/2004 11/16/2005
6/10/2004 8/22/2007
1/26/2005 9/4/2007
6/28/2005 8/24/2006
8/24/2005
10/10/2005 9/25/2008
1/25/2007
6/27/2007
6/1/2007

Broadstreet, Bruce E.
5/18/2004 10/10/2005 10/25/2007
6/8/2004 10/25/2007
6/8/2004 10/25/2007
6/8/2004 10/25/2007
6/8/2004 10/25/2007
1/26/2005 10/25/2007
10/10/2005 10/25/2007
11/23/2005 11/9/2006 10/27/2009
11/23/2005 11/9/2006 10/27/2009

Burnette, Brian

2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010

Emergency
Fire Extinguisher
Emergency Actions Plan
Lockout/Tagout
Personal Protective Equip
Bloodborne Pathogens
Reach Truck Forklift Class 11 Atlantic Coast Toyota

Hazard Communications Safety Alliance
Bloodborne Pathogens Safety Alliance
Lockout/Tagout Safety Alliance
Fire Extinguisher Safety United
& Contingency Plan Safety United
Emergency Actions Plan Safety United
Hazardous Waste Management ERC
DOT - Hazardous Materials ERC
Propane - Forklift Safety Class Davenport Energy
Work Place First Aid
Confined Space Entry & Attendant Training Safety United
Scissor Lift Hertz
Reach Truck Forklift Class 11 Atlantic Coast Toyota

Log Out/Tagout Safety United
Forklift Accidents Safety United
Personal Protective Equip
Bloodborne Pathogens Safety United
Emergency Actions Plan Safety United
Hazard Communications Safety United
Fire Extinguisher Atlantic Coast Toyota
Reach Truck Forklift Class 11

Hazard Communications Safety Alliance
Bloodborne Pathogens Safety Alliance
Lockout/Tagout Safety Alliance
Fire Extinguisher Safety Alliance
Emergency Actions Plan Safety Alliance
Personal Protective Equip. Safety Alliance
Hazardous Waste

Fire Extinguisher Safety United
& Contingency Plan Safety United
Emergency Actions Plan Safety United

Hazard Communications Safety Alliance
Bloodborne Pathogens Safety Alliance
Lockout/Tagout Safety Alliance
Fire Extinguisher Safety Alliance
Emergency Actions Plan Safety Alliance
Personal Protective Equip. Safety Alliance
Forklift Accidents Safety Alliance
Hazardous Waste Contingency Safety Alliance

Burdell, Kenya	6/21/2007	Hazardous Communications	Safety United
	6/21/2007	Bloodborne Pathogens	Safety United
	6/21/2007	Lockout/Tagout	Safety United
	6/21/2007	Fire Extinguisher	Safety United
	6/21/2007	Emergency/Actions Plan	Safety United
	6/21/2007	Personal Protective Equipment	Safety United
	6/21/2007	Respiratory Protection/Voluntary	Safety United
	6/21/2007	Forklift/Academic	Safety United
	6/21/2007	Hazardous Waste	Safety United

Carter, Christine	6/11/2007	Fire Extinguisher	Safety United
	6/11/2007	Emergency/Actions Plan	Safety United

Carr, Ben	11/28/2005	Fire Extinguisher	Safety United
	11/28/2005	Emergency/Actions Plan	Safety United
	10/10/2005	Hazard Communications	Safety United
	8/24/2006	Lockout/Tagout	Safety United
	10/11/2006	Forklift/Academic	Safety United
		Personal Protective Equip.	Safety United
		Bloodborne Pathogens	Safety United
	6/24/2006	Read Forklift Class 11	Atlantic Coast Toyota
	6/24/2007		

Carter, Melvin	5/18/2004	10/10/2005	
	6/8/2004		
	6/8/2004	11/23/2005	7/31/2007
	6/8/2004	11/23/2005	7/31/2007
	7/22/2004	7/31/2007	7/10/2009
	1/26/2005		
	6/28/2005		
Carter, Mike	6/21/2007	Hazard Communications	Safety United
	6/21/2007	Bloodborne Pathogens	Safety United
	6/21/2007	Lockout/Tagout	Safety United
	6/21/2007	Fire Extinguisher	Safety United
	6/21/2007	& Contingency Plan	Safety United
	6/21/2007	Emergency Actions Plan	Safety United
	6/21/2007	Personal Protective Equip.	Safety United
	6/21/2007	Forklift/Academic	Safety United
	6/21/2007	Hazardous Waste	Safety United
	6/21/2007	40 CFR 265.16(a)(2)	Safety United
	6/21/2007	Respiratory Protection (Voluntary)	Safety United
	6/21/2007	Fire Extinguisher	Safety United
	6/21/2007	& Contingency Plan	Safety United
	6/21/2007	Emergency Actions Plan	Safety United
	6/21/2007		

Cassidy, Sarah	6/21/2007	Hazard Communications	Safety United
	6/21/2007	Bloodborne Pathogens	Safety United
	6/21/2007	Lockout/Tagout	Safety United
	6/21/2007	Fire Extinguisher	Safety United
	6/21/2007	& Contingency Plan	Safety United
	6/21/2007	Emergency Actions Plan	Safety United
	6/21/2007	Personal Protective Equip.	Safety United
	6/21/2007	Forklift/Academic	Safety United
	6/21/2007	Hazardous Waste	Safety United
	6/21/2007	40 CFR 265.16(a)(2)	Safety United
	6/21/2007	Respiratory Protection (Voluntary)	Safety United
	6/21/2007	Fire Extinguisher	Safety United
	6/21/2007	& Contingency Plan	Safety United
	6/21/2007	Emergency Actions Plan	Safety United

Cassidy, Melissa	6/29/2006	Fire Extinguisher	Safety United
	6/29/2006	Emergency/Actions Plan	Safety United

Clark, Donna	10/27/2009	Emergency Actions Plan	Safety United
	10/27/2009	Fire Extinguisher	Safety United

Clark, Fran	10/14/2005	Forklift/Academic	

Clark, Jean

7/31/2007	Safety United
7/31/2007	Hazard Communications
7/31/2007	Bloodborne Pathogens
7/31/2007	Lockout/Tagout
7/31/2007	Fire Extinguisher
10/25/2007	Emergency Actions Plan
7/31/2007	Personal Protective Equip.

Clark, Wally Harry

10/28/2009	Safety United
10/28/2009	Hazard Communications
10/28/2009	Bloodborne Pathogens
10/28/2009	Lockout/Tagout
10/28/2009	Fire Extinguisher
10/28/2009	Emergency Actions Plan
10/28/2009	Personal Protective Equip.
10/28/2009	Respiratory Protection (Voluntary)
10/28/2009	Forklift/Accident

Clark, Kenneth

10/28/2009	Safety United
10/28/2009	Hazard Communications
10/28/2009	Bloodborne Pathogens
10/28/2009	Lockout/Tagout
10/28/2009	Fire Extinguisher
10/28/2009	Emergency Actions Plan
10/28/2009	Personal Protective Equip.
10/28/2009	Respiratory Protection (Voluntary)
10/28/2009	Forklift/Accident

Clark, Charles

8/24/2006	Safety United
8/24/2006	Hazard Communications
7/31/2007	Lockout/Tagout
10/27/2009	Fire Extinguisher
6/8/2006	Emergency Actions Plan
7/31/2007	Personal Protective Equip.

Clinton, Mike

5/26/2010	Safety Alliance
5/26/2010	Fire Extinguisher
5/26/2010	Emergency Actions Plan
5/26/2010	Forklift/Accident

Cook, Ryan Leigh

11/23/2005	Safety United
11/23/2005	Fire Extinguisher
11/23/2005	Emergency Actions Plan
11/23/2005	Forklift/Accident

Coleman, Wesley

5/18/2004	Safety Alliance
6/8/2004	Hazard Communications
6/8/2004	Bloodborne Pathogens
6/8/2004	Lockout/Tagout
6/8/2004	Fire Extinguisher
6/8/2004	Emergency Actions Plan
1/26/2005	Personal Protective Equip.
6/24/2004	Safety Alliance

6/10/2004

DOT - Hazardous Materials

ERC

4/12/2005

9/25/2008

7/10/2009

HM-126

Propane - Forklift Safety Class

Work Place First Aid

Reach Truck Forklift Class 11

Scissor Lift Training

Atlantic Coast Toyota

Hertz

Safety Alliance

Davenport Energy

Atlantic Coast Toyota

Hertz

Colle, Jessica
10/27/2009
10/27/2009

Emergency Actions Plan
Fire Extinguisher
Safety Alliance
Safety Alliance

Comer, Randy
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
5/15/2008

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Forklift Academic
Scissor Lift Training
Safety Alliance
Safety United
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety United
Safety Alliance
Heiz

Coutinas, Carlos
1/26/2005

Personal Protective Equip
Safety Alliance

Coz, Elizabeth
9/28/2004
9/28/2004

Fire Extinguisher
Emergency Actions Plan
Safety Alliance
Safety Alliance

Craddock, Tim
10/28/2009
10/28/2009
10/28/2009
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10/28/2009
10/28/2009

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Forklift Academic
Safety United
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Safety United

Craighead, Donna
4/24/2008
4/24/2008
4/24/2008
4/24/2008
4/24/2008
4/24/2008
10/28/2009

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Respiratory (Voluntary)
Emergency Actions Plan
Reach Truck Forklift Class 11
Safety Alliance
Safety United
Safety Alliance
Safety Alliance
Safety Alliance
Atlantic Coast Toyota

Curry, Allison
9/28/2004
9/28/2004

Fire Extinguisher
Emergency Actions Plan
Safety Alliance
Safety Alliance

Deshaun, Bentley
6/24/2004
6/24/2004
9/28/2004
9/28/2004
6/24/2004
6/24/2004
6/24/2004
6/28/2005

Hazard Communications
Hazardous Materials
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip
Hazardous Waste
DOT Hazardous Materials
DOT Hazardous Materials
Propane Forklift Safety Class
Safety Alliance
Safety Alliance
Safety Alliance
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Safety Alliance
Safety Alliance
Davenport Energy

Davidson, Terrance
10/10/2005

Forklift Academic
Safety Alliance

Davis, Melodie
8/22/2006
8/22/2006
11/9/2006

Fire Extinguisher
Emergency Actions Plan
Safety United
Safety United

Fire Extinguisher Emergency Actions Plan

Fire Extinguisher	Safety Alliance
Emergency Actions Plan	Safety Alliance
Personal Protective Equip	Safety Alliance

Propane = Forlift Safety Class
Davenport Energy
We're Here To Help
American Red Cross
Café

**Confined Space Entry & Attendant Training,
Hazard Communications
Safety Union**

Do HazMat Training? ERO

Hazard Communications	Safety United
Bloodborne Pathogens	Safety United
Lockout/Tagout	Safety United
Fire Extinguisher	Safety United
& Contingency Plan	Safety United
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety United

For information, contact
Sally Little

Lockout/Tagout

Elite Extinguisher

Personal & Active Equipment

Peel's Accidents

Hazard Communications	Safety United
Bloodborne Pathogens	Safety United
Fire Extinguisher	Safety United
& Contingency Plan	Safety United
Emergency Actions Plan	Safety United

Fire Extinguisher
Emergency Actions Plan

The Extinguisher
Safety United

Personal Protective Equip. Safety Unified

Propane Forklift Safety Class

hazardous Waste

10 CFR 265.16(e)(2)

Emergency Actions Plan Fire Extinguisher	Safety United Safety United

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Draper, Gary	5/26/2010	Hazard Communications	Safety United
	5/26/2010	Bloodborne Pathogens	Safety United
	5/26/2010	Lockout/Tagout	Safety United
	5/26/2010	Fire Extinguisher	Safety United
	5/26/2010	& Coningery/Plan	Safety United
Duncan, Elda	5/26/2010	Emergency Actions Plan	Safety United
	5/26/2010	Forklift/Accident	Safety United
	9/25/2009	Bloodborne Pathogens	Safety Alliance
	9/25/2009	Forklift Academy	Safety Alliance
	9/25/2009	Lockout/Tagout	Safety Alliance
Eates, Katherine	9/25/2009	Respiratory (Yob)	Safety Alliance
	9/25/2009	Hazardous Communications	Safety Alliance
	9/25/2009	Emergency Actions Plan	Safety Alliance
	10/28/2009	Reach Truck/Forklift Class 11	Atlantic Coast Toyota
Edwards, Emsline	7/31/2007	Hazard Communications	
	7/31/2007	Bloodborne Pathogens	
	7/31/2007	Lockout/Tagout	
	7/31/2007	Fire Extinguisher	
	7/31/2007	Emergency Actions Plan	
Farris, Thomas	7/31/2007	Personal Protective Equip	
	7/31/2007	Forklift/Accident	
	8/24/2006	Hazard Communications	
	8/24/2006	Bloodborne Pathogens	
	8/24/2006	Lockout/Tagout	
Felts, Desmond	8/24/2006	Fire Extinguisher	
	8/24/2006	Emergency Actions Plan	
	8/24/2006	Personal Protective Equip	
	8/24/2006	Forklift/Accident	
	8/24/2006		

Farris, Thomas	3/29/2006	7/31/2007	
	3/29/2006	7/31/2007	
	3/29/2006	7/10/2009	
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Felts, Desmond	3/29/2006	10/27/2009	
	3/29/2006	10/27/2009	
	3/29/2006	10/25/2007	
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Farris, Thomas	3/29/2006	6/21/2007	
	3/29/2006	10/25/2007	
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Farris, Thomas	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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Felts, Desmond	3/29/2006		
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Farris, Thomas	3/29/2006		
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	3/29/2006		

Finney, Pam

2/22/2007	Hazard Communications	Safety United
2/22/2007	Bloodborne Pathogens	Safety United
2/22/2007	Lockout/Tagout	Safety United
2/22/2007	Fire Extinguisher	Safety United
2/22/2007	& Contingency Plan	Safety United
2/22/2007	Emergency Actions Plan	Safety United
2/22/2007	Personal Protective Equip.	Safety United
10/28/2009	Forklift/Accident	Safety United
7/10/2009	Reach Truck Forklift Class 11	Atlantic Coast Toyota

Finney, Pam

3/20/2008	Hazard Communications	Safety United
3/20/2008	Bloodborne Pathogens	Safety United
3/20/2008	Fire Extinguisher	Safety United

Foley, Peggy

5/18/2004	Fire Extinguisher	Safety Alliance
6/9/2004	Emergency/Actions Plan	ERC

France, Jonathan

5/18/2004	Hazard Communications	Safety Alliance
6/9/2004	Hazardous Waste Management	ERC
6/10/2004	DOT - Hazardous Materials	ERC
9/23/2004	Fire Extinguisher	Safety Alliance
9/23/2004	Emergency/Actions Plan	Safety Alliance

France, Robin

7/22/2004	7/31/2007	7/8/2009	Personal Protective Equip.	Safety United
1/26/2005	2/22/2007		Fire Extinguisher	Safety Alliance
4/12/2005	2/22/2007		Emergency Actions Plan	Safety Alliance
4/12/2005	2/22/2007	7/31/2007	Hazard Communications	Safety United

Frederick, Regina

2/11/2005	Personal Protective Equip.	Safety Alliance
4/12/2005	Forklift/Accident	Safety Alliance
4/12/2005	Fire Extinguisher	Safety Alliance
4/12/2005	Emergency/Actions Plan	Safety Alliance

Fulcher, S. Russ

3/29/2006	11/9/2006	10/27/2009	Fire Extinguisher	Safety United
3/29/2006	10/27/2009		Emergency Actions Plan	Safety United

Fung, Ching-Mu

6/10/2004	DOT - Hazardous Materials	ERC
8/17/18/04	Hazardous Waste Management	ERC
2/12/2005	Fire Extinguisher	Safety Alliance
2/12/2005	Emergency/Actions Plan	Safety Alliance

Gerasimov, Timothy

3/20/2008	Hazard Communications	Safety Alliance
3/20/2008	Bloodborne Pathogens	Safety Alliance
3/20/2008	Fire Extinguisher	Safety Alliance
3/20/2008	Emergency Actions Plan	Safety Alliance

Gillispie, Steven

5/26/2010	Hazard Communications	Safety United
5/26/2010	Emergency Actions Plan	Safety United

5/18/2004	10/14/2005	10/25/2007	
6/8/2004	10/25/2007		
6/8/2004	10/25/2007		
6/8/2004	11/23/2005	8/1/2007	10/25/2007
6/8/2004	11/23/2005	10/25/2007	
6/10/2004	10/10/2005		

7/22/2004	8/1/2007	7/10/2009
1/26/2005	10/25/2007	
6/30/2005		
8/24/2005		
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8/1/2007	10/27/2009
8/1/2007	10/27/2009
9/25/2008	
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4/6/2005
10/16/2005
8/24/2006

9/23/2004
9/23/2004

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Hazard Communications	Safety Alliance
Bloodborne Pathogens	Safety Alliance
Lockout/Tagout	Safety Alliance
Fire Extinguisher	Safety Alliance
Emergency Actions Plan	Safety Alliance
DOT - Hazardous Materials	ERC
HM-126	
Personal Protective Equip.	Safety Alliance
Propane - Forklift Safety Class	Davenport Energy
Work Place First Aid	Atlantic Coast Toyota
Scissor Lift Training	Hertz
Reach Truck Forklift Class 11	

Fire Extinguisher	Emergency Actions Plan	Hazard Communications	Lockout/Tagout	Scissor Lift Training	Hertz
Hazard Communications	Bloodborne Pathogens	Lockout/Tagout	Fire Extinguisher	Emergency Actions Plan	Personal Protective Equip.
Respiratory Protection (Voluntary)	Safety Alliance	Safety United	Safety Alliance	Safety Alliance	Safety United

Personal Protective Equip.	Safety Alliance
North Academic	Safety Alliance
Fine Existing Site	Safety Alliance
Emergency Actions Plan	Safety Alliance
Propose - Forklift Safety Class	Safety Alliance
Hazard Communication	Safety Alliance
DOT - Hazardous Materials	Safety Alliance
49 CFR 172.101	
OSHA & DOT RRC TRAINING	UNVAR
Hazardous Waste	Safety United
40 CFR 268.10(a)(2)	
Leakout Report	

Fire Extinguisher
Emergency Actions Plan
Safety Alliance
Safety Alliance

Hazardous Communications	Safety United
Prokita Academic	Safety United
Emergency Action Plan	Safety United
Fine Exhaustor	Safety United
Headcounting	
Personal Protective Equip.	
Bloodborne Pathogens	Safety United

3/20/2008	Hazard Communications	Safety Alliance
3/20/2008	Bloodborne Pathogens	Safety Alliance
3/20/2008	Lockout/Tagout	Safety Alliance
3/20/2008	Fire Extinguisher	Safety Alliance
3/20/2008	Emergency/Accidents Plan	Safety Alliance
3/20/2008	Personal Protective Equip.	Safety Alliance
3/20/2008	Respiratory Protection (Voluntary)	Safety Alliance

7/31/2007	Hazard Communications	Safety United
7/31/2007	Bloodborne Pathogens	Safety United
7/31/2007	Lockout/Tagout	Safety United
7/31/2007	Fire Extinguisher	Safety United
10/25/2007	Emergency Actions Plan	Safety United
7/31/2007	Personal Protective Equip.	Safety United
7/31/2007		Safety United

4/22/2006	Forklift Academic	Safety Alliance
4/22/2006	Fire Extinguisher	Safety Alliance
4/22/2006	Emergency Actions Plan	Safety Alliance
6/28/2006	Propane, Forklift Safety Class	Dayco/Energy
8/22/2006	Lockout/Tagout	Safety United
8/22/2006	Personal Protective Equip.	Safety United
8/22/2006	Bloodborne Pathogens	Safety United

4/24/2008	Hazard Communications	Safety Alliance
4/24/2008	Bloodborne Pathogens	Safety United
4/24/2008	Lockout/Tagout	Safety Alliance
4/24/2008	Respiratory (Voluntary)	Safety Alliance
4/24/2008	Emergency Actions Plan	Safety Alliance

1/26/2005	Personal Protective Equip.	Safety Alliance
10/14/2005	Forklift Academic	Safety United
10/14/2005	Hazard Communications	Safety United
8/24/2006	Fire Extinguisher	
8/24/2006	Emergency/Accidents Plan	
8/24/2006	Propane, Forklift Safety Class	
8/24/2006	Lockout/Tagout	
8/24/2006	Hazardous Waste	
40 CFR 265.16(e)(2)		

6/27/2007	Self Propelled Sissor Lift	Hertz
9/26/2008	Training	
	Emergency Actions Plan	Safety Alliance

3/29/2006	Emergency Actions Plan	
3/29/2006	Fire Extinguisher	
3/29/2006	& Contingency Plan	

11/23/2006	Emergency Actions Plan	Safety United
11/23/2006	Fire Extinguisher	Safety United

10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
7/8/2009

Hazard Communications	Safety United
Bloodborne Pathogens	Safety United
Lockout/Tagout	Safety United
Fire Extinguisher	Safety United
& Contingency Plan	Safety United
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety United

University of Illinois

9/4/2006
7/8/12007
7/8/12007
10/4/02005
3/29/2006
3/29/2006
8/24/2005

Workplace Safety & Health Administration
Emergency Actions Plan
Fire Extinguisher
Personal Protective Equip.
For All Academic
Programs For All Safety Class
Hazard Communications
Hazardous Waste
40 CFR 265.6(a)(2)
Reach Into
American Red Cross
Safety United
Safety United
Mantle Gas Flow

American Red Cross

9/23/2004	3/29/2006	10/27/2009
9/23/2004	3/29/2006	10/27/2009

Fire Extinguisher	Safety Alliance
Emergency Actions Plan	Safety Alliance

2/22/2007
2/22/2007
2/22/2007
2/22/2007
2/22/2007
2/22/2007

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
PPE/Extinguishers
OSHA Contingency Plan
Emergency Actions Plan
Respiratory Protection/Evaluation
Flammable/Toxicity Safety Class
Forklift/Accident
Hazardous Waste
40 CFR 2601.16(a)(2)

5/18/2004	10/10/2005	10/25/2007
6/8/2004	10/25/2007	
6/8/2004	10/25/2007	
6/8/2004	10/25/2007	
6/8/2004	7/31/2007	
2/1/2005	10/25/2007	
6/28/2005		
11/23/2005	7/10/2009	
10/25/2007		

Hazard Communications	Safety Alliance
Bloodborne Pathogens	Safety Alliance
Lookout/Tagout	Safety Alliance
Fire Extinguisher	Safety Alliance
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety Alliance
Propane - Forklift Safety Class	Davenport Energy
Locking Assembly	Safety United
Hazardous Waste	

Safety Unit

6/20/2008
6/20/2008
6/20/2008
6/20/2008
6/20/2008
6/20/2008
6/20/2008

Bloodborne Pathogens	Safety Alliance
Hazard Communication	Safety Alliance
Lockout/Tagout	Safety Alliance
PPE/Ergonomics	Safety Alliance
Emergency/Accident Plan	Safety Alliance
Personal Protective Equip.	Safety Alliance
Respiratory Protection (Mandatory)	Safety Alliance
Forklift/Accidents	Safety Union
Readiness	Safety Union
Alcohol/Restrictions	Safety Union

Atlantic Coast Toyota Lift

Headen, Dustin

3/20/2008
3/20/2008
3/20/2008
3/20/2008

Hazard Communications
Bloodborne Pathogens
Fire Extinguisher
Emergency Actions Plan
Safety Alliance
Safety Alliance
Safety Alliance
Safety United

Heimstuter, Barry

6/2/2007
7/31/2007

Safety United
Fire Extinguisher
Emergency Actions Plan

Hoback, Donald E

8/1/2007
8/1/2007
8/1/2007
8/1/2007
8/1/2007
8/1/2007

Emergency Actions Plan
Lockout/Tagout
Fire Extinguisher
& Emergency Plan
Forklift Academic
Personal Protective Equip.
Bloodborne Pathogens

Hollandsworth, Dwayne

6/24/2004
6/24/2004
9/23/2004
9/23/2004
1/26/2005
6/24/2004
10/14/2005
7/31/2007

Hazard Communications
Safety United
Emergency Actions Plan
Personal Protective Equip.
Safety United

Hollandsworth, Michael

6/24/2004
8/24/2005
8/24/2006
11/23/2005
7/31/2007
10/28/2009
10/28/2009
10/28/2009
10/28/2009
10/28/2009
10/28/2009
10/28/2009

Work Place First Aid
American Red Cross
Forklift Academic
Bloodborne Pathogens
Safety United
Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Forklift Academic
Safety United

Hollandsworth, Steven

10/14/2005
8/24/2006
8/24/2006
8/24/2006
8/24/2006
8/24/2006
7/8/2009
7/31/2007

Forklift Academic
Fire Extinguisher
Emergency Actions Plan
Lockout/Tagout
Personal Protective Equip.
Bloodborne Pathogens
Hazard Communications
Safety United

3/29/2006
3/29/2006
3/29/2006
3/29/2006
3/29/2006
3/29/2006
8/1/2007

6/8/2004	3/29/2006
6/8/2002	10/25/2007
6/8/2004	3/29/2006
6/8/2004	10/25/2007
6/8/2004	10/25/2007
4/26/2005	10/25/2007
6/12/2004	10/25/2007
6/24/2004	
6/28/2005	
8/24/2005	
10/10/2005	
6/10/2005	3/29/2006
	10/25/2007

6/21/2007
6/21/2007

6/24/2004

6/24/2004	10/10/2005
9/23/2004	
9/23/2004	8/1/2007
6/28/2005	
	10/10/2005

10/10/2005
8/22/2006

Lane, M. Brandon	8/24/2006			
	3/29/2006	10/25/2007	10/27/2009	
	3/29/2006	10/25/2007	10/27/2009	
	3/29/2006	10/25/2007		
	3/29/2006	10/25/2007		
	5/9-10/2006	8/22/2007	12/16/2008	11/4/2009
	5/11/2006			

10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007

一、*Chrysomelidae* 葉甲科
 二、*Curculionidae* 象鼻蟲科
 三、*Chrysomelidae* 葉甲科
 四、*Curculionidae* 象鼻蟲科
 五、*Chrysomelidae* 葉甲科
 六、*Curculionidae* 象鼻蟲科
 七、*Chrysomelidae* 葉甲科
 八、*Curculionidae* 象鼻蟲科
 九、*Chrysomelidae* 葉甲科
 十、*Curculionidae* 象鼻蟲科

Bloodborne Pathogens
Biocontainment
Breakout/Aggravation
Fire/Escapes
Emergency Actions Plan
Personal Protective Equip.
Hazardous Waste
DOT - Hazardous Materials
9 CFR 172.02
Propane Forklift Safety Class
Workplace Injury And
Forklift Accidents
Hazard Communications
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Davenport Energy
American Red Cross
Safety United
Safety United

Fire Extinguisher
Emergency Actions Plan
Safety/Unified
Safety/Unified

DOT - Hazardous Materials
49 CFR 172.704

Emergency Actions Plan	Safety Alliance
Propane - Forklift Safety Class	Davenport Energy

Propane - Forklift Safety Class
Personal Protective Equip. **Safety United**

Hazard Communications	ERCC
Fire Extinguisher	
Emergency Actions Plan	
Lockout/Tagout	
Personal Protective Equip.	
Hazardous Waste Management	

Introduction

Hazard Communications	Safety United
Biochemical Parameters	Safety United
Food/Outfitting	Safety United
Fire/Emergency	Safety United
Contingency Plan	Safety United
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety United
Food/In-Camping	Safety United

Landford, Timothy A.		
5/18/2004	Hazard Communications	Safety Alliance
6/6/2004	Biohazard/Patients	Safety Alliance
6/8/2004	Lockout/Tagout	Safety Alliance
6/8/2004	Fire Extinguishers	Safety Alliance
7/22/2004	Emergency/Actions Plan	Safety Alliance
6/24/2004	Rollkit (Academic)	Safety Alliance
	Hazardous Waste	Safety Alliance
6/10/2004	40 CFR 265.16(a)(2)	
	DOT-Hazardous Materials	ERC
	HM-126	

Lawson, Larry

2/22/2007	Hazardous Communications
10/25/2007	Bloodborne Pathogens
2/22/2007	Fire Extinguisher
2/22/2007	Contingency Plan
2/22/2007	Emergency Actions Plan
2/22/2007	Lockout/Tagout
2/22/2007	Personal Protective Equip.
6/27/2007	Scissor Lift Training

Hertz

Lemons, Doug		
2/25/2010	Hazard Communications	Safety Alliance
2/25/2010	Bloodborne Pathogens	Safety Alliance
2/25/2010	Lockout/Tagout	Safety Alliance
2/25/2010	Fire Extinguisher	Safety Alliance
2/25/2010	Emergency Actions Plan	Safety Alliance
2/25/2010	Personal Protective Equip.	Safety Alliance
2/25/2010	Training Activities	Safety Alliance
	Hazardous Waste Contingency Plan 40 CFR 262.34	Safety Alliance

News Sheet					
11/9/2006					Forklift Accidents
11/9/2006					Hazardous Communications
11/9/2006					Bloodborne Pathogens
11/9/2006	2/22/2007	10/25/2007			Fire Extinguishers Contingency Plan
11/9/2006	2/22/2007	10/25/2007			Emergency Action Plan Hazardous Waste
					40 CFR 265.1(a)(2)
2/22/2007	10/25/2007				Personal Protective Equip. lockout/tagout
2/22/2007	10/25/2007				Dust/Hazardous Materials
					Safety Alliance
					Safety Alliance
					ERG

owery, Natasha	10/27/2009	Emergency Actions Plan
	10/27/2009	Fire Extinguisher

9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008

Hazard Communications	Safety Alliance
Bloodborne Pathogens	Safety Alliance
Lookout/Tagout	Safety Alliance
Fire Extinguisher	Safety Alliance
Emergency Actions Plan	Safety Alliance
Personal Protective Equip.	Safety Alliance
Respiratory Protection (Voluntary)	Safety Alliance

Confidentiality Alliance

8/24/2006
8/24/2006
8/24/2006
8/24/2006
8/24/2006

Hazardous Communications	Safety United
Forklift/Accidents	Safety United
Emergency/Accidents/Plan	Safety United
Fire/Extinguishers	Safety United
Lockout/Tagout	Safety United
Personal Protective Equip.	
Bloodborne Pathogens	

9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008

Health Communications	Safety Alliance
Local Board Members	Safety Alliance
Local Council	Safety Alliance
Local Emergency Response	Safety Alliance
Local Emergency Plan	Safety Alliance
Local Emergency Equipment	Safety Alliance
Local Emergency (Volunteer)	Safety Alliance
Local Emergency	Safety Alliance

8/24/2006 11/9/2006
8/24/2006
8/24/2006

File Extension
Emergency Actions Panel

9/28/2004
9/28/2004

Fire Extinguisher
Emergency Addons Plan
Safety Alliance
Safety Alliance



Disaster Communications File Exchange: Emergency Action Plan Solidity Available

8/24/2006	10/25/2007	10/25/2007
11/23/2005	10/25/2007	10/25/2007
11/23/2005	7/10/2009	
11/23/2005	10/25/2007	
9/14/2008		

Hazard Communications	Safety United
Fire Extinguisher	Safety United
Emergency Actions Plan	Safety United
Propane - Forklift Safety Class	Safety United
Lookout/Tagout	
Personal Protective Equip.	
Forklift, Aerial-Drive	Safety United
Hazardous Waste	
Reach Truck	Atlantic Coast

Safety United

Atlantic Coast Toyota Lift

9/6/2004	1/23/2005	2/22/2007
9/12/2004	1/12/2005	2/22/2007
8/24/2005		
2/22/2007		

Fire Extinguisher
Emergency Action Plan
Workplace First Aid
Lockout/Tagout
Safety Alliance
Safety Alliance
American Red Cross
Safety Alliance

Migliori, Doug

Miller, Bobby	
2/22/2007	Hazard Communications
2/22/2007	Biohazard Pathogens
2/22/2007	Lockout/Tagout
2/22/2007	Fire/Air Quality
2/22/2007	Contingency Plan
2/22/2007	Emergency/Evacuation Plan
2/22/2007	Personal Protective Equipment
2/22/2007	Potential Forklift Safety Class
2/22/2007	Forklift Academy
2/22/2007	Hazardous Waste
2/22/2007	40 CFR 261-269.1(a)(6)

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Webster, Moore	11/23/2005	Emergency Action Plan	Safety United
	10/28/2005	Emergency Action Plan	Safety United

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Moore, Matt

Motley, Jason

2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Hazardous Waste Contingency Plan 40 CFR 262.34
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance

Motley, Ashley

11/9/2006 10/27/2009
11/9/2006 10/27/2009

Fire Extinguisher
& Contingency Plan
Emergency Actions Plan

Mouyos, Glen M.

7/22/2004 7/31/2007 10/25/2007
9/23/2004 11/23/2005 10/25/2007
9/23/2004 11/23/2005 10/25/2007
1/26/2005 10/25/2007
6/28/2005
8/24/2005
10/10/2005 10/25/2007
8/22/2006 9/25/2008
10/25/2007
6/1/2007
5/15/2008

Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Propane - Forklift Safety Class
Work Place First Aid
Hazard Communications
Lockout/Tagout
Bloodborne Pathogens
Reach Truck Forklift Class 11
Scissor Lift Training
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Davenport Energy
American Red Cross
Safety United
Safety United
Atlantic Coast Toyota
Hertz

Neal, Sharon

11/9/2006
11/9/2006
11/9/2006

Forklift (Aptentec)
Hazard Communications
Bloodborne Pathogens
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.

Neamo, Ricky

10/25/2007
10/25/2007 7/10/2009
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
9/14/2008

Hazard Communications
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Propane - Forklift Safety Class
Lockout/Tagout
Hazardous Waste
Bloodborne Pathogens
Reach Truck
Safety Alliance
Safety Alliance
Safety United
Safety Alliance
Safety Alliance
Safety United
Safety United
Atlantic Coast Toyota Lift

Noel, Jennifer

3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Forklift/Accident
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety United
Safety United
Safety United
Safety United

Oakley, James

10/25/2007 6/8/2008
10/25/2007

Forklift/Accident
Hazard Communications

Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.

Forced (Asphyxiation)	Safety United
Hazard Communications	Safety United
Bloodborne Pathogens	Safety United
Fire Extinguisher	Safety United
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety United

FireExtinguisher
Emergency/Actions Plan
Residual Protective Equip
Hazard Communications
Lockout/Tagout

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Hazardous Communications
Hazardous Materials
Logistics/Logistics
Fire Extinguishers
Emergency Actions Plan
Personal Protective Equip.
DOT - Hazardous Materials
OSHA 1910.120
Hazardous Waste
DOT OSHA 1910.120
Florida Academic
Popocatepetl Safety Class
California State School

Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliances

Safety Alliance
Safety Alliance
Denverport Energy
American Red Cross

Hazard Communications	Safety Alliance
Respiratory Protection	Safety Alliance
Personal Protective Equip.	Safety Alliance
Propane - Forklift Safety Class	Safety Alliance

Hazardous Waste

11/9/2006 10/27/2009

Fire Extinguisher	Safety Alliance
Contingency Plan	
Emergency Actions Plan	Safety Alliance

Penn, Letreivia

5/26/2010
5/26/2010

Perkins, Vivian

7/31/2007 7/8/2009

7/31/2007

7/31/2007

7/31/2007

7/31/2007

7/31/2007

10/25/2007

7/31/2007

Phillips, Bendall Neil

5/18/2004 10/10/2005 10/25/2007

9/23/2004 3/29/2006

9/23/2004 3/29/2006 8/1/2007

1/26/2005 3/29/2006

10/10/2005 7/8/2009

3/29/2006

Phillips, Evette

4/12/2005 3/29/2006 11/9/2006 10/27/2009

4/12/2005 3/29/2006 11/9/2006 10/27/2009

Phillips, Matt

3/29/2006 10/27/2009

3/29/2006 10/27/2009

Pigg, Jeff

5/18/2004 10/10/2005

6/6/2004

6/6/2004

6/6/2004

6/6/2004

6/24/2004

6/24/2004

6/24/2004

4/12/2005

6/29/2005

Porter, Regina

3/29/2006 10/27/2009
3/29/2006 11/9/2006 10/27/2009

Rakes, Kim

6/29/2007

6/29/2007

Hazard Communications
Emergency Actions Plan
Safety United

Hazard Communications
Bloodborne Pathogens
Safety United

Lockout/Tagout
Safety United

Fire Extinguisher
Safety United

& Contingency Plan
Safety United

Emergency Actions Plan
Safety United

Personal Protective Equip.
Safety United

Hazard Communications
Safety United

Fire Extinguisher
Safety United

Emergency Actions Plan
Safety United

Personal Protective Equip.
Safety United

Forklift (Attachments)
Safety United

Propane - Forklift Safety Class
Safety United

Lockout/Tagout
Safety United

Fire Extinguisher
Safety United

Emergency Actions Plan
Safety United

Emergency Actions Plan
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Fire Extinguisher
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Emergency Actions Plan
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Fire Extinguisher
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Fire Extinguisher
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Emergency Actions Plan
Safety United

Emergency Actions Plan
Safety United

Fire Extinguisher
Safety United

Ramey, Theresa

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
& Contingency Plan
Emergency Actions Plan
Personal Protective Equip
Forklift Academic
Hazardous Waste
40 CFR 265.16(a)(2)

Reed, Susan

6/21/2007
6/24/2007
6/24/2007
7/6/2007
7/6/2007
7/6/2007
6/21/2007
6/21/2007
6/21/2007
6/21/2007

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
& Contingency Plan
Emergency Actions Plan
Personal Protective Equip
Forklift Academic
Hazardous Waste
40 CFR 265.16(a)(2)

Reed, Michelle

10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
10/25/2007
9/14/2008
9/8/2009

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
& Contingency Plan
Emergency Actions Plan
Personal Protective Equip.

Reed, David

11/23/2005
11/23/2005
3/29/2006
10/25/2007
11/23/2005
11/23/2005
11/23/2005
3/29/2006
10/25/2007
6/21/2007

Propane - Forklift Safety Class
Hazard Communications
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Hazardous Waste
40 CFR 265.16(a)(2)

Reynolds, Kenneth

4/12/2005
4/12/2005
4/12/2005
6/28/2005
6/27/2007
3/29/2006
11/9/2006
10/27/2009
10/27/2009

Forklift Academic
Fire Extinguisher
Emergency Actions Plan
Propane - Forklift Safety Class
Scissor Lift Training

Scissor Lift Training
Reach Truck Forklift Class 11

Hertz
Atlantic Coast Toyota
Safety Alliance
Safety Alliance
Davenport Energy
Hertz

Richardson, Geoffrey

2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Hazardous Waste Contingency
Plan 40 CFR 262.34

Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance

Richardson, Jimmy

3/29/2006
3/29/2006
3/29/2006
3/29/2006
3/29/2006

Forklift/Accident
Propane - Forklift Safety Class
Hazard Communications
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
DOT - Hazardous Materials
PPE 120

Safety/United
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United

Roberts, Cury

5/18/2004 10/14/2005 9/25/2008
6/8/2004
6/8/2004
6/8/2004
6/8/2004
6/10/2004

Hazard Communications
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Propane - Forklift Safety Class
Scissor Lift Training
Reach Truck Forklift Class 11

Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Hertz
Atlantic Coast Toyota

Robertson, James

9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
10/28/2009

Personal Protective Equip.
Hazard Communications
Respiratory Protection (Voluntary)
Lockout/Tagout
Bloodborne Pathogens
Forklift Academy
Emergency Actions Plan
Fire Extinguisher
Reach Truck Forklift Class 11

Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Atlantic Coast Toyota

Robinson, Rance

11/9/2006 7/10/2006
11/9/2006 7/10/2006
11/9/2006 7/10/2006
11/9/2006 7/10/2006
11/9/2006 7/10/2006

Forklift/Accident
Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.

Safety/United
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United

Shoup, Tim

5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010

Showfety, Ernie

8/24/2005
8/22/2006
8/22/2006

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Safety United
Safety United
Safety United
Safety United
Safety United
Safety United

Slack, Clarence

9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/14/2008

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Hazardous Waste Contingency
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Atlantic Coast Teyote Lift

Skarber, Jim

8/22/2006
8/22/2006

Fire Extinguisher
Emergency Actions Plan
Safety United
Safety United

Smith, Kevin

2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010
2/25/2010

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Hazardous Waste Contingency
Plan 40 CFR 262.34
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance

Smith, Lauren

2/22/2007
2/22/2007
2/22/2007
2/22/2007
2/22/2007
2/22/2007
2/22/2007

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Hazardous Waste Contingency
Plan 40 CFR 262.34
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance

Smith, Samuel

4/12/2006
4/12/2006
4/12/2006
4/12/2006

Fire Extinguisher
Emergency Actions Plan
Hazardous Waste Contingency
Plan 40 CFR 262.34
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance

Spencer, Yvonne

8/1/2007
8/1/2007
10/27/2009
10/27/2009

Emergency Actions Plan
Fire Extinguisher

6/21/2007
6/21/2007
6/21/2007
10/25/2007
8/1/2007
6/21/2007
6/21/2007
6/21/2007
9/4/2008

Hazard Communications	Safet United
Bloodborne Pathogens	Safet United
Lockout/Tagout	Safet United
Fire Extinguisher	
Emergency Actions Plan	
Personal Protective Equip.	
Propane - Forklift Safety Class	Safet United
Hazardous Waste	Safet United
40 CFR 265.16(a)(2)	
Reach Truck	Atlantic Coast Towage 11th

8/24/2006
8/24/2006
8/24/2006
8/24/2006
8/24/2006
8/24/2006
8/24/2006

**Hazard Communications
Bloodborne Pathogens
Hazardous Waste
Emergency/Action Plan
Personal Protective Equip-
ment/Incident Response
for the Academic**

9/23/2004	11/23/2005
9/23/2004	11/23/2005
2/1/2005	
10/4/2005	
11/23/2005	

Fire Extinguisher	Safety Alliance
Emergency Actions Plan	Safety Alliance
Personal Protective Equipment	Safety Alliance
First Aid	Safety United
Hazard Communications	Safety Alliance
Proposed Forklift Safety Class	Daveport Energy

5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010

Hazard Communications	Safety United
Bloodborne Pathogens	Safety United
Lockout/Tagout	Safety United
Fire Extinguisher	Safety United
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety United
Respiratory Protection (Voluntary)	Safety United

10/28/2009
10/28/2009
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10/28/2009
10/28/2009
10/28/2009
10/28/2009

Hazard Communications	Safety United
Bloodborne Pathogens	Safety United
Lockout/Tagout	Safety United
Fire Extinguisher	Safety United
Emergency Actions Plan	Safety United
Personal Protective Equip.	Safety United
Respiratory Protection (Voluntary)	Safety United
Portland Academic Knifft Academic	Safety United

9/25/2008
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9/25/2008
9/25/2008
9/25/2008
9/25/2008

Herzberg Communications	Safety Alliance
Bloodborne Pathogens	Safety Alliance
Lockout/Tagout	Safety Alliance
Fire Extinguishers	Safety Alliance
Emergency Actions Plan	Safety Alliance
Personal Protective Equip.	Safety Alliance
Respiratory Protection (Vollman)	Safety Alliance
Confined Spaces	Safety Alliance

2/22/2007	
2/22/2007	
2/22/2007	
2/22/2007	
2/22/2007	
2/22/2007	8/1/2007
2/22/2007	
2/22/2007	7/8/2009

Hazard Communications	Safety Alliance
Bloodborne Pathogens	Safety Alliance
Lockout/Tagout	Safety Alliance
Fire Extinguisher	Safety Alliance
& Contingency Plan	Safety Alliance
Emergency Actions Plan	Safety Alliance
Personal Protective Equip.	Safety Alliance
Propane - Forklift Safety Class	Safety Alliance

For Profit Academic	Safety United
Propane - For Profit Safety Class	Safety United
Mazda/Communications	Safety United
Lockout/Tagout	Safety United
Flite Extinguisher	Safety United
Emergency Actions Plan	Safety United
Sasolna Fire Protection Equip.	Safety United

6/24/2004	10/10/2005
6/24/2004	

<p> DOT - Hazardous Materials 49 CFR 172.704 </p>	<p> Safety Alliance </p>
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Propane - Forklift Safety Class	Davenport Energy
Emergency Actions Plan	Safety Alliance
Fire Extinguisher	Safety Alliance
Reach Truck Forklift Class 11	Atlantic Coast Towing

9/25/2008

Emergency Actions Plan	Safety Alliance
Emergency Actions Plan	Safety Alliance

9/23/2004
9/23/2004

Fire & Insurance **Safety Alliance**
Emergency Action Plan **Safety Alliance**

10/12/2005
8/24/2006
8/24/2006
8/24/2006
8/24/2006
8/24/2006

[Hazardous Communications](#)
[Hire Extinguisher](#)
[Emergency Actions Plan](#)
[Property & Facility Safety Class](#)
[Lockout/Tagout](#)
[Personal Protective Equip](#)
[Forklift/Accident](#)
[DOT - Hazardous Materials](#)
[49 CFR 172.004](#)

Thompson, Larry

10/28/2009
10/28/2009
10/28/2009
10/28/2009
10/28/2009
10/28/2009
10/28/2009

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Forklift Academic
Safety United
Safety United
Safety United
Safety United
Safety United
Safety United
Safety United

49 CFR 172.704

Safety United
Safety United

Thompson, William

9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008
9/25/2008

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Forklift Academic
Safety/Alliance
Safety/Alliance
Safety/Alliance
Safety/Alliance
Safety/Alliance
Safety/Alliance
Safety/Alliance

Van Leeuwen, Alice

8/24/2005
11/23/2005
11/23/2005

Walt Paces First Aid
Fire Extinguisher
Emergency Actions Plan
American Red Cross
American Red Cross
American Red Cross

Van Leeuwen, Giovanni

10/10/2005
10/10/2005
11/23/2005
11/23/2005
8/29/2006
8/29/2006
8/29/2006

Forklift Academic
Hazard Communications
Fire Extinguisher
Emergency Actions Plan
Lockout/Tagout
Personal Protective Equip.
Propane - Forklift Safety Class
Bloodborne Pathogens
DOT - Hazardous Materials
49 CFR 172.704
Safety United
Safety United
Safety United
Safety United
Safety United
Safety United
Safety United

Walker, Bryce

7/22/2004
9/23/2004
9/23/2004
11/23/2005
8/22/2006
8/22/2006
8/22/2006

Forklift Academic
Hazard Communications
Emergency Actions Plan
Propane - Forklift Safety Class
DOT - Hazardous Materials
49 CFR 172.704
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance

Wentz, Nicholas

10/14/2005
10/14/2005
3/29/2006
3/29/2006
3/29/2006
3/29/2006
3/29/2006

Forklift Academic
Hazard Communications
Fire Extinguisher
Emergency Actions Plan
Propane - Forklift Safety Class
Lockout/Tagout
Personal Protective Equip.
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United
Safety/United

Weatherford, Tommy

7/22/2004 4/24/2008 7/10/2009
9/23/2004 7/31/2007
9/23/2004 10/25/2007
1/26/2005 10/25/2007
6/28/2005
8/24/2005
10/10/2005 10/25/2007
8/24/2006
8/24/2006
6/1/2007

Wells, Vonzell

5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010

Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Propane - Forklift Safety Class
Work Place First Aid
Hazardous Communications
Lockout/Tagout
Bloodborne Pathogens
Reach Truck Forklift Class 11
Hazard Communications
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan

Safety Alliance
Safety Alliance
Safety Alliance
Davenport Energy
Atlantic Coast Toyota
Safety United
Safety United
Safety United
Safety United

Whitehead, Robert

Williams, Catherine H.

3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
9/14/2008

Fire Extinguisher
Emergency Actions Plan
Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Reach Truck

Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Atlantic Coast Toyota Lift

Williams, Heather

7/22/2002
1/26/2005
4/12/2005
6/28/2005

Forklift (Accident)
Personal Protective Equip.
Fire Extinguisher
Emergency Actions Plan
Propane - Forklift Safety Class

Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Davenport Energy

Willemsen, John

5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010
5/26/2010

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Forklift Academy

Safety United
Safety United
Safety United
Safety United
Safety United
Safety United
Safety Alliance

Wingard, Paul

2/22/2007
2/22/2007
2/22/2007

Fire Extinguisher
Emergency Plan
Emergency Actions Plan

LAST DAY - 8/3/07

Wingard, Kimberly

9/26/2004 10/26/2005 11/9/2006
9/28/2004 11/26/2005 11/9/2006
6/24/2005

Fire Extinguisher
Emergency Plan
Emergency Actions Plan
Work Place First Aid
Safety Alliance
Safety Alliance
American Red Cross

Woods, Clyde

10/28/2009
10/28/2009

10/28/2009
7/10/2009
10/28/2009

Young, Ronald

10/25/2007
10/25/2007
10/25/2007
10/25/2007

10/25/2007
10/25/2007
10/25/2007

Young, Matt R.

3/20/2008
3/20/2008
3/20/2008
3/20/2008
3/20/2008
7/10/2009
10/28/2009

Young, Stephen T.

11/23/2005 1/31/2006 9/25/2008
1/31/2006 7/10/2009
11/23/2005 10/25/2007
11/23/2005 10/25/2007

10/25/2007
3/29/2006 10/28/2009

10/25/2007
10/28/2009

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout

Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.

Respiratory Protection (Voluntary)

Reach Truck Forklift Class 11 Atlantic Coast Toyota

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
& Contingency Plan
Emergency Actions Plan
Personal Protective Equip.
Safety United
Safety United
Safety United
Safety United
Safety United
Safety United

Hazard Communications
Bloodborne Pathogens
Lockout/Tagout
Fire Extinguisher
Emergency Actions Plan
Personal Protective Equip.
Respiratory Protection (Voluntary)
Safety United
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety Alliance
Safety United

Reach Truck Forklift Class 11 Atlantic Coast Toyota

Hazardous Communications
Fire Extinguisher
Emergency Actions Plan
Propane - Forklift Safety Class
Lockout/Tagout
Personal Protective Equip.
DOT - Hazardous Materials
49 CFR 172.704
Bloodborne Pathogens
Reach Truck Forklift Class 11
Safety United
Safety United
Safety United
Safety United
Safety United
Safety United
Atlantic Coast Toyota

10/25/2007
10/28/2009

Attachment #6

Material Safety Data Sheet



Zep Inc.
1310 Seaboard Industrial Blvd.
Atlanta, GA 30318
1-877-I-BUY-ZEP (428-9937)
www.zep.com

Superior Solutions

Section 1. Chemical Product and Company Identification

Product name ZEP POWERHOUSE
Product use Aerosol Cleaner and Wax Stripper
Product code 0282
Date of issue 07/22/08 **Supersedes** 06/28/05

Emergency Telephone Numbers

For MSDS Information:

Compliance Services 1-877-I-BUY-ZEP (428-9937)

For Medical Emergency

INFOTRAC: (877) 541-2016 Toll Free - All Calls Recorded

For Transportation Emergency

CHEMTREC: (800) 424-9300 - All Calls Recorded
In the District of Columbia (202) 483-7616

Prepared By

Compliance Services
1420 Seaboard Industrial Blvd.
Atlanta, GA 30318

Printing date: 09/11/08



00213

B310

COMMONWEALTH LAMINATING COATING
345 BEAVER CREEK DRIVE
MARTINSVILLE VA 24115

Section 2. Hazards Identification

Emergency overview

DANGER !

CAUSES EYE BURNS. CAUSES SKIN IRRITATION. MAY BE HARMFUL IF ABSORBED THROUGH SKIN.

CONTENTS UNDER PRESSURE.

NOTE: MSDS data pertains to the product as delivered in the original shipping container(s). Risk of adverse effects are lessened by following all prescribed safety precautions, including the use of proper personal protective equipment.

*Hazard Determination System (HDS): Health, Flammability, Reactivity



Acute Effects

Routes of Entry

Dermal contact. Eye contact. Inhalation.

Eyes

Causes eye burns. Direct contact with the eyes can cause irreversible damage, including blindness.

Skin

Causes skin irritation. May be harmful if absorbed through the skin. Prolonged exposure may result in skin burns and ulcerations. Skin inflammation is characterized by itching, scaling, reddening or, occasionally, blistering.

Inhalation

Avoid breathing vapors, spray or mists. Over-exposure by inhalation may cause respiratory irritation. Can cause central nervous system (CNS) depression.

Ingestion

May be harmful if swallowed. Aspiration hazard if swallowed. Can enter lungs and cause damage. Ingestion may cause nausea, weakness and central nervous system effects.

Chronic effects

Overexposure of this product by inhalation or absorption can produce central nervous system depression resulting in headache, nausea and/or dizziness. Repeated or prolonged exposure to spray or mist may produce respiratory tract irritation leading to frequent attacks of bronchial infection. Repeated or prolonged contact with spray or mist may produce chronic eye irritation and severe skin irritation. Contains material which may cause damage to the following organs: blood, kidneys, lungs, liver, upper respiratory tract, skin, eyes, central nervous system (CNS), ears.

Ingredients: Not listed as carcinogen by OSHA, NTP or IARC.

Additional Information: See Toxicological Information (Section 11)

Section 3. Composition/Information on Ingredients

ETHANOL; ethyl alcohol; grain alcohol	64-17-5	10 - 20
MONOETHANOLAMINE; 2-aminoethanol; MEA	141-43-5	1 - 5
ETHYLENE GLYCOL MONOBUTYL ETHER; 2-butoxyethanol; butyl cellosolve	111-76-2	1 - 5
ISOPROPYL ALCOHOL; ipa; dimethylcarbinol; 2-propanol	67-63-0	<3
HYDROCARBON PROPELLANT; blend of propane & isobutane	75-28-5; 74-98-6	1 - 10

Section 4. First Aid Measures

- Eye Contact** Immediately flush eyes with plenty of water, occasionally lifting the upper and lower eyelids. Check for and remove any contact lenses. Continue to rinse for at least 10 minutes. Get medical attention immediately.
- Skin Contact** Flush contaminated skin with plenty of water. Remove contaminated clothing and shoes. Continue to rinse for at least 10 minutes. Wash clothing before reuse. Get medical attention if irritation develops.
- Inhalation** Move exposed person to fresh air. If irritation persists, get medical attention.
- Ingestion** Do not induce vomiting unless directed to do so by medical personnel. If vomiting occurs, the head should be kept low so that vomit does not enter the lungs. If affected person is conscious, give plenty of water to drink. Never give anything by mouth to an unconscious person. Get medical attention immediately.

Section 5. Fire Fighting Measures

National Fire Protection Association (U.S.A.)



- Flash Point** Closed cup: 29.4°C (84.9°F)
- Flammable Limits** Not available.
- Flammability** Non-flammable. (CSMA Method)
- Fire hazard** CONTENTS UNDER PRESSURE. In a fire or if heated, a pressure increase will occur and the container may burst, with the risk of a subsequent explosion. Bursting aerosol containers may be propelled from a fire at high speed.
- Fire-Fighting Procedures** Use an extinguishing agent suitable for the surrounding fire. Cool closed containers exposed to fire with water. Fire-fighters should wear appropriate protective equipment.

Section 6. Accidental Release Measures

- Spill Clean up** Large spills are unlikely due to packaging.

Section 7. Handling and Storage

- Handling** Put on appropriate personal protective equipment (see section 8). Store and use away from heat, sparks, open flame or any other ignition source. Avoid contact with eyes. Avoid prolonged or repeated contact with skin. Do not breathe vapor or mist. Do not ingest. Use only with adequate ventilation. Observe label precautions. Wash contaminated clothing before reusing. Wash thoroughly after handling.
- Storage** CONTENTS UNDER PRESSURE. Do not puncture, incinerate or store the container at temperatures above 49°C (120°F) or in direct sunlight. Keep away from food, drink and animal feeding stuffs. Keep out of the reach of children.

Section 8. Exposure Controls/Personal Protection**Product name**

ETHANOL; ethyl alcohol; grain alcohol

HYDROCARBON PROPELLANT; blend of propane & isobutane

MONOETHANOLAMINE; 2-aminoethanol; MEA

ETHYLENE GLYCOL MONOBUTYL ETHER; 2-butoxyethanol; butyl cellosolve

ISOPROPYL ALCOHOL; ipa; dimethylcarbinol; 2-propanol

Exposure limits

ACGIH TLV / OSHA PEL (United States).

TWA: 1000 ppm 8 hour(s).

ACGIH TLV / OSHA PEL (United States). Notes: Propane

TWA: 1000 ppm 8 hour(s).

OSHA PEL / ACGIH TLV (United States).

TWA: 3 ppm 8 hour(s).

OSHA / ACGIH (United States).

STEL: 6 ppm 15 minute(s).

ACGIH TLV (United States).

TWA: 20 ppm 8 hour(s). Form:

OSHA PEL (United States). Skin

TWA: 50 ppm 8 hour(s). Form:

ACGIH TLV (United States).

TWA: 200 ppm 8 hour(s).

OSHA PEL (United States).

TWA: 400 ppm 8 hour(s).

ACGIH/OSHA (United States).

STEL: 400 ppm 15 minute(s).

Personal Protective Equipment (PPE)

- Eyes** Safety glasses.
- Body** Recommended: Neoprene gloves. Nitrile gloves. Rubber gloves.
- Respiratory** Use with adequate ventilation. Provide exhaust ventilation or other engineering controls to keep the airborne concentrations of vapors below their respective occupational exposure limits.



Section 9. Physical and Chemical Properties

Physical State Liquid. [Acrosol.]
pH 10.5 - 11.5
Boiling Point 98.3°C (208.9°F)
Specific Gravity 0.97
Solubility Easily soluble in the following materials: cold water and hot water.

Color Clear. Colorless.

Odor Pine.

Vapor Pressure Not determined.

Vapor Density Not determined.

Evaporation Rate <1 (Water = 1)

VOC (Consumer) 286 (g/l), 2.39 lbs/gal (29.6%)

Section 10. Stability and Reactivity

Stability and Reactivity The product is stable.

Incompatibility Keep away from heat, sparks and flame. Reactive or incompatible with the following materials: oxidizing materials and acids.

Hazardous Polymerization Will not occur.

Hazardous Decomposition Products carbon oxides (CO, CO₂), oxides of nitrogen

Section 11. Toxicological Information

Acute Toxicity

Product/ingredient name	Result	Species	Dose	Exposure
Ethanol	LD50 Oral	Rat	7060 mg/kg	-
	LC50 Inhalation Vapor	Rat	20000 mg/m ³	4 hours
Monoethanolamine	LD50 Dermal	Rabbit	>1000 mg/kg	-
	LD50 Oral	Rat	1750 mg/kg	-
Ethylene Glycol Monobutyl Ether	LD50 Dermal	Rabbit	680 mg/kg	-
	LD50 Oral	Rat	1746 mg/kg	-
	LC50 Inhalation Vapor	Rat	450 ppm	4 hours
Isopropyl Alcohol	LD50 Dermal	Rabbit	13000 mg/kg	-
	LD50 Oral	Rat	4700 mg/kg	-
	LC50 Inhalation Vapor	Rat	22500 ppm	8 hours
	LC50 Inhalation Vapor	Rat	19000 ppm	8 hours

Section 12. Ecological Information

Environmental Effects No known significant effects or critical hazards.

Aquatic Ecotoxicity

Not available.

Section 13. Disposal Considerations

Waste Information

Waste must be disposed of in accordance with federal, state and local environmental control regulations. Consult your local or regional authorities for additional information.

Waste Stream Non-hazardous waste

Section 14. Transport Information

Regulatory information	UN number	Proper shipping name	Classes	PG*	Label
DOT Classification	Not regulated.	Consumer commodity ORM-D			
IMDG Class	Not determined.				

NOTE: DOT classification applies to most package sizes. For specific container size classifications or for size exceptions, refer to the Bill of Lading with your shipment.

PG* : Packing group

Section 15. Regulatory Information

U.S. Federal Regulations

SARA 313 toxic chemical notification and release reporting:

Product name

Ethylene Glycol Monobutyl Ether

Clean Water Act (CWA) 307: No products were found.

Clean Water Act (CWA) 311: No products were found.

Clean Air Act (CAA) 112 regulated toxic substances: No products were found.

All Components of this product are listed or exempt from listing on TSCA Inventory.

State Regulations

California Prop 65 No products were found.

Section 16. Other Information

To the best of our knowledge, the information contained herein is accurate. However, neither the above named supplier nor any of its subsidiaries assumes any liability whatsoever for the accuracy or completeness of the information contained herein. Final determination of suitability of any material is the sole responsibility of the user. All materials may present unknown hazards and should be used with caution. Although certain hazards are described herein, we cannot guarantee that these are the only hazards that exist.

*NOTE: Hazard Determination System (HDS) ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks. Although these ratings are not required on MSDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HDS ratings are to be used with a fully implemented program to relay the meanings of this scale.

Attachment #7

NMP

Date of Preparation: September 2003

Revision: 2

Section 1 - Chemical Product and Company Identification**Product/Chemical Name:** NMP**Chemical Formula:** CH₃NC₄H₆O**Other Designations:** N-Methyl-2-Pyrrolidone; Normal-Methyl-2-Pyrrolidone; 1-Methyl-2-Pyrrolidone**General Use:** A component of lacquer coatings, thinners, paint removers, solvent cleaners, and stripper for photo resisters.**Manufacturer:** Kanto Corporation, 13424 N. Woodrush Way, Portland, OR 97203**Non-Emergency Contact:** Customer Service: Phone (503) 283-0405, FAX (503) 240-0409**For All Transportation Emergencies Call CHEMTREC at 1-800-424-9300****Section 2 - Composition/Information on Ingredients**

Ingredient Name	CAS Number	% by wt
N-Methyl-2-Pyrrolidone	872-50-4	100%

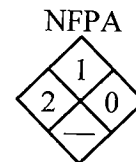
Ingredient	OSHA PEL		ACGIH TLV		NIOSH REL	
	TWA	STEL	TWA	STEL	TWA	STEL
N-Methyl-2-Pyrrolidone	None established		None established		None established	

Section 3 - Hazards Identification**☆☆☆☆☆ Emergency Overview ☆☆☆☆☆**

Combustible. Colorless liquid with mild amine odor. Irritating to the eyes, skin, and respiratory system.
Chronic liver effects. Remove all ignition sources before handling.

HMIS
H 2
F 1
R 0
PPE†
 †Sec. 8

Potential Health Effects**Primary Entry Routes:** Inhalation, ingestion.**Target Organs:** Eyes, skin, mucous membranes.**Acute Effects****Inhalation:** Vapor is highly discomforting to the upper respiratory tract resulting in nausea, headache, giddiness, and mental confusion. Hazard increases at higher temperatures and may be more harmful with prolonged exposure.**Eye:** Vapor and liquid is discomforting and may cause temporary impairment of vision, inflammation, and ulceration. Direct contact with liquid may cause burning or stinging, watering and inflammation of the conjunctiva and temporary corneal clouding.**Skin:** Enhances skin permeability for other substances. Liquid is discomforting to the skin and may cause drying leading to dermatitis, reddening, and swelling with symptoms of nausea, headache, giddiness, and mental confusion. Prolonged contact can lead to severe dermatitis, redness, cracking, swelling, blisters, and edema.**Ingestion:** Gastrointestinal discomfort, nausea, pain, and vomiting are symptoms if swallowed. If aspirated into the lungs while vomiting, chemical pneumonitis can result.**Carcinogenicity:** Not listed**Medical Conditions Aggravated by Long-Term Exposure:** Skin, liver and blood conditions.**Chronic Effects:** Dermatitis, nervous system impairment, liver tumors, and blood changes.**Section 4 - First Aid Measures****Eye Contact:** Gently lift eyelids and flush immediately and continuously with copious amounts of water for at least 15 minutes. Do not allow the victim to rub or keep eyes tightly shut. Consult an ophthalmologist immediately.**Skin Contact:** Rinse with flooding amounts of water, while removing contaminated clothing, for at least 15 minutes. Wash with soap and water. Seek medical attention immediately. Wash clothing before reuse.**Ingestion:** If the victim is conscious, give large amounts of water. Seek medical attention immediately. Never give anything by mouth to an unconscious or convulsing person.**Inhalation:** Remove exposed person to an uncontaminated atmosphere and support breathing. If not breathing, give artificial respiration. Seek medical attention immediately.*After first aid, seek appropriate in-plant, paramedic, or community medical support.*

Section 5 - Fire-Fighting Measures**Flash Point:** 205°F (96 °C)**Flash Point Method:** Open Cup**Auto ignition Temperature:** 518°F (270 °C)**LEL:** 1.5 % v/v**UEL:** 9.5 % v/v**Flammability Classification:** Combustible liquid.**Extinguishing Media:** Water spray or fog, powder, alcohol resistant foam, or carbon dioxide.**Unusual Fire or Explosion Hazards:** Heat may cause expansion leading to violent rupture of containers. Slight fire hazard when exposed to heat or flame.**Hazardous Combustion Products:** Toxic fumes including nitrogen oxides and carbon monoxide.**Fire-Fighting Instructions:** Contact fire department and tell them location and nature of hazard. Prevent spillage from entering drains or waterways. Do not approach containers suspected to be hot. Cool fire-exposed containers with water spray from a protected location. If safe to do so, remove containers from path of fire. Avoid spraying water onto liquid pools.**Fire-Fighting Equipment:** Because fire produces toxic thermal decomposition products, wear a self-contained breathing apparatus (SCBA) with a full-face piece operated in pressure-demand or positive-pressure mode. Equipment should be thoroughly decontaminated after use.**Section 6 - Accidental Release Measures****Small Spills:** Remove all ignition sources. Clean up spills wearing proper personal protective equipment. Contain and absorb spill with sand, earth, or other inert material. Wipe up residue and place in a suitable container for disposal.**Large Spills:** Contact fire department and tell them the location and nature of the hazard. Wear respiratory protection and proper personal protective equipment. Prevent spillage from entering drains or waterways. Eliminate all ignition sources. Contain spill with inert material. Collect recoverable product for recycling. Absorb remaining material with sand, earth, or vermiculite. Wash area and prevent runoff into drains.**Regulatory Requirements:** Follow applicable OSHA regulations (29 CFR 1910.120) in addition to any state or federal guidelines.**Section 7 - Handling and Storage****Handling Precautions:** Wear proper personal protective equipment. Use in a well-ventilated area. Avoid smoking, bare lights, or ignition sources. Keep containers securely sealed when not in use. Avoid physical damage to containers. Observe manufacturer's storing and handling recommendations.**Recommended Storage Methods:** Glass, metal can or drum. Check all containers are clearly labeled and free from leaks. Package as recommended by the manufacturer.**Regulatory Requirements:** Follow applicable federal, state and local regulations and guidelines.**Section 8 - Exposure Controls / Personal Protection****Engineering Controls****Ventilation:** Provide general or local exhaust ventilation systems to maintain airborne concentrations below OSHA PELs (Sec. 2). Local exhaust ventilation is preferred because it prevents contaminant dispersion into the work area by controlling it at its source.**Administrative Controls****Respiratory Protection:** Seek professional advice prior to respirator selection and use. Follow OSHA respirator regulations (29 CFR 1910.134) and, if necessary, wear a MSHA/NIOSH-approved respirator. Select respirator based on its suitability to provide adequate worker protection for given working conditions, level of airborne contamination, and presence of sufficient oxygen. For emergency or non-routine operations (cleaning spills, reactor vessels, or storage tanks), wear an SCBA.*Warning! Air-purifying respirators do not protect workers in oxygen-deficient atmospheres.* If respirators are used, OSHA requires a written respiratory protection program that includes at least: medical certification, training, fit testing, periodic environmental monitoring, maintenance, inspection, cleaning, and convenient, sanitary storage areas.**Protective Clothing/Equipment:** Wear chemically protective gloves, boots, aprons, and gauntlets to prevent prolonged or repeated skin contact. Wear protective eyeglasses or chemical safety goggles, per OSHA eye- and face-protection regulations (29 CFR 1910.133). Contact lenses are not eye protective devices. Appropriate eye protection must be worn instead of, or in conjunction with contact lenses.**Safety Stations:** Make emergency eyewash stations, safety/quick-drench showers, and washing facilities available in work area.**Contaminated Equipment:** Separate contaminated work clothes from street clothes. Launder before reuse. Remove this material from your shoes and clean personal protective equipment.**Comments:** Never eat, drink, or smoke in work areas. Practice good personal hygiene after using this material, especially before eating, drinking, smoking, using the toilet, or applying cosmetics.

Section 9 - Physical and Chemical Properties**Physical State:** Liquid**Appearance and Odor:** Colorless with characteristic amine odor**Vapor Pressure:** 0.29 mm Hg at 20°C**Vapor Density (Air=1):** 3.4**Formula Weight:** 99.15**pH:** Not applicable**Water Solubility:** Soluble**Boiling Point:** 396°F (202°C)**Melting Point:** -11.2°F (-24°C)**% Volatile:** 100**Evaporation Rate:** No information available**Density:** 1.03 at 25°C**Specific Gravity (H₂O=1, at 4 °C):** 1.03**Section 10 - Stability and Reactivity****Stability:** Stable under normal handling conditions.**Polymerization:** Hazardous polymerization will not occur.**Chemical Incompatibilities:** Strong oxidizers such as hydrogen peroxide, nitric acid, and sulfuric acid.**Conditions to Avoid:** Increasing heat.**Hazardous Decomposition Products:** Thermal oxidative decomposition of mixture can produce carbon dioxide and nitrogen oxides.**Section 11- Toxicological Information*****Acute Effects:**Rat, inhalation, TC: 1gm/m³Mouse, oral, LD₅₀: 5130 mg/kgRat, oral, LD₅₀: 3914 mg/kgRabbit, skin, LD₅₀: 8 gm/kg**Chronic Effects:** Dermatitis, nervous system impairment, liver tumors, and blood changes.**Carcinogenicity:** Not listed**Mutagenicity:** Sex chromosome loss and disjunction**Reproductive:** Fetotoxicity, CNS development, decrease in fertility

* See NIOSH, RTECS (UY5970000), for additional toxicity data.

Section 12 - Ecological Information**Ecotoxicity:** No information available.**Environmental Fate:** Readily biodegrades when exposed to the environment.**Section 13 - Disposal Considerations****Disposal:** Contact your supplier or a licensed contractor for detailed recommendations. Recycle when possible. Incinerate residue at approved site.**Disposal Regulatory Requirements:** Follow applicable federal, state, and local regulations.**Section 14 - Transport Information****DOT Transportation Data (49 CFR 172.101):**

Not regulated for transportation

Section 15 - Regulatory Information**EPA Regulations:**

RCRA Hazardous Waste Classification (40 CFR 261): Not classified

CERCLA Hazardous Substance (40 CFR 302.4) unlisted specific per RCRA, Sec. 3001; CWA, Sec. 311 (b)(4); CWA, Sec. 307(a), CAA, Sec. 112

CERCLA Reportable Quantity (RQ): None

SARA 311/312 Codes: None

SARA Toxic Chemical (40 CFR 372.65): Listed

SARA EHS (Extremely Hazardous Substance) (40 CFR 355): None

TSCA: Listed

OSHA Regulations:

Air Contaminant (29 CFR 1910.1000, Table Z-1, Z-1-A): None

Section 16 - Other Information**Revision Notes:** Rev 1 - Sections 11 and 14.

Rev 2 - 2/7/2005, Section 14

Disclaimer: This Material Safety Data Sheet is offered solely for the customer's information, consideration and investigation. Kanto Corporation provides no express or implied warranties with respect to the information contained herein. Although all data included in this MSDS is believed to be accurate, Kanto Corporation makes no representations as to its accuracy, sufficiency or completeness. Conditions of use are beyond Kanto Corporation's control and therefore users are responsible to verify this data under their own operating conditions to determine whether the product is suitable for their particular purposes, and they assume all risks of their use, handling, and disposal of the product, or from the use of, or reliance upon, information contained herein

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<small>Shipper agrees to state specifically in writing the agreed or declared value of the property for which the shipper is not to be held liable.</small>																																																																																																							
Note: Liability for loss or damage in this shipment may be applicable. See 49 USC § 14706(c)(1)(A) and (B).																																																																																																							

Attachment #8

CUSTOMER NO

EVETTE

BILL OF LADING
BLUE RIDGE
 Solvents & Coatings, Inc.
 3800 Original Henry Rd • P.O. Box 759 • Henry, VA 24102
 Office: 276.629.5325 • Toll Free: 877.387.8511 • Fax: 276.629.3787

ORDER DATE

B/L NUMBER

23782

SOLD TO

COMMONWEALTH LAMINATING & COATING, INC.
 P.O. BOX 4668
 MARTINSVILLE, VA 24115
 276-632-4991
 276-632-0173 FAX

SHIP TO

COMMONWEALTH LAMINATING
 345 BEAVER CREEK DRIVE
 MARTINSVILLE, VA 24112
 276-632-4991
 EVETTE ext237

THE SELLER MAKES NO WARRANTY, EXPRESS OR IMPLIED, CONCERNING THE GOODS FURNISHED HEREUNDER OTHER THAN THAT THEY SHALL BE OF THE QUALITY AND SPECIFICATIONS STATED HEREIN. THE BUYER ASSUMES ALL RESPONSIBILITY AND LIABILITY FOR LOSS OR DAMAGE RESULTING FROM THE HANDLING AND OR USE OF SAID GOODS WHETHER USED AS SUCH OR IN COMBINATION OR MIXTURES WITH OTHER SUBSTANCES. SELLER'S LIABILITY FOR DAMAGES SHALL IN NO EVENT EXCEED THE PURCHASE PRICE OF THE MATERIAL USED WITH RESPECT TO WHICH DAMAGES ARE CLAIMED. CLAIMS ON ACCOUNT OF WEIGHT, QUALITY, LOSS OR DAMAGE, ARE WAIVED UNLESS MADE IN WRITING WITHIN TEN DAYS AFTER ARRIVAL THEREOF AT DESTRUCTION. ALL RETURNABLE CONTAINERS MUST BE PAID FOR AND NO DISCOUNT WILL BE ALLOWED. DEPOSIT CONTAINERS REMAIN THE PROPERTY OF THE SELLER, MONIES ON DEPOSIT ARE REFUNDABLE IF CONTAINER IS RETURNED IN GOOD CONDITION WITH 60 DAYS.

CUSTOMER ORDER NO		DEL DATE		SALES ID		OP ID		FREIGHT		SHIP VIA	
				MM				BRS&C		OUR TRUCK	
UNITS			H M	PACKAGE	DESCRIPTION	QUANTITY					
ORDERED	SHIPPED	BO				NET	GROSS				
	198			55 GAL DRUM (EMPTY)	EMPTY DRUM PICK UP NOT DOT REGULATED						
	5			Return							
MUST HAVE C.O.A. WITH BILL OF LADING											
						TOTAL					

CUSTOMER CERTIFIES THAT TANKER HOSES HAVE BEEN ATTACHED TO PROPER STORAGE TANK VALVE AND TANKER VALVE BEFORE UNLOADING.

CUSTOMER SIGNATURE:

RETURNABLE CONTAINERS	TYPE CONTAINER	DEPOSIT AMOUNT	THIS IS TO CERTIFY THAT THE ABOVE NAMED MATERIALS ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED AND LABELED AND ARE IN PROPER CONDITION FOR TRANSPORTATION ACCORDING TO THE APPLICABLE REGULATIONS OF THE DEPARTMENT OF TRANSPORTATION.	
			WARNING: CHEMICALS ARE DANGEROUS. EXCESSIVE INHALING OF VAPORS OR PROLONGED CONTACT WITH SKIN MAY BE HARMFUL. CONSULT MATERIAL SAFETY DATA SHEET.	Subject to Section 7 of Conditions, if this shipment is to be delivered to the consignee without recourse on the consignor, the consignor shall sign the following statement: The carrier shall not make delivery of the shipment without payment of freight and all other lawful charges.
			DELIVERED BY: <i>[Signature]</i>	
			RECEIVED BY: <i>[Signature]</i> 11-3-10	<i>Amanda Martin</i> (signature of Consignor)

FOR CHEMICAL
 EMERGENCY
 SPILL, LEAK, FIRE
 EXPOSURE OR
 ACCIDENT
 CALL CHEMTREC
 DAY OR NIGHT
 800-424-9300

OUR ACCEPTANCE OF THIS SHIPMENT CONSTITUTES ACCEPTANCE OF THE FOLLOWING ADDITIONAL TERMS:
 YOU AGREE TO PAY INTEREST OF 11 1/2% PER MONTH ON ANY BALANCE UNPAID WITHIN 30 DAYS OF SHIPMENT, AND
 AN ATTORNEY'S FEE OF 25% OF THE UNPAID BALANCE, PLUS COURT COSTS, ON ANY UNPAID BALANCE SENT TO OUR ATTORNEY FOR COLLECTION.
 SELLER REPRESENTS THAT WITH RESPECT TO THE PRODUCTION OF THE ARTICLES AND/OR THE PERFORMANCE OF THE SERVICES COVERED BY THIS INVOICE, IT HAS FULLY COMPLIED WITH SECTION 12(A) OF THE FAIR LABOR STANDARDS ACT OF 1938 AS AMENDED.